

Qmark International Certifications Pvt. Ltd

Standard Operating Manual

Based on ISO Guide 65,



**Moyur Garden, NH-37 Sonapur, Opposite Sonapur
College Gate, Kamrup (Metro), Kamrup, Assam,
INDIA, 782402**

Issue No.	01	Issue Date:	05.05.21	Copy No.	001
Rev. No	001	Rev. Date:		Issued to	



Qmark International Certifications Pvt. Ltd.

House No. 4, Chandan Nagar, Survey Beltola Assam – Email:
qmarkcertifications@gmail.com

Author: Mr. Ratnesh Singh	Standard Operating Manual	Issue - 0
Approval: Mr. Ranjan Baruah	PGS Certification	Page No. 2 of 54 Effective: 05/05/2021

Qmark International Certifications Pvt. Ltd. was established in 2019 by Mr. Ranjan Baruah (Director 1), Mr. Ratnesh Singh (Director 2), and associates as a firm specializing in third-party certification services and Participatory Guarantee System (PGS). Since its inception, the company has been dedicated to providing training and enhancing the capacity of organic growers in the North Eastern region of India on diverse certification procedures and their associated advantages.

Qmark International Certifications Pvt. Ltd. has resolved to initiate organic certification services with specific standards, accompanied by technological support from its IT division. This initiative aims to aid and empower farming and trading communities in India to meet both national and international legal requirements pertaining to the specific commodities/products they produce for consumption. This expansion will further enhance Qmark's existing services within India.

Qmark International Certifications Pvt. Ltd. comprises a team of youthful, dynamic technocrats hailing from diverse business and technology sectors, amalgamating years of collective expertise. The management cadre and research team possess educational credentials from esteemed institutions, including premier universities and agricultural establishments across India.

Integrated quality and E management system, according to the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2016 is implemented at all levels of " **Qmark International Certifications Pvt. Ltd.** " Ltd. by mid-2019.

Imposed tradition, experience and embedded IMS /Integrated Management System/ in " Qmark International Certifications Pvt. Ltd. " is a guarantee for quality and traceable certification system.

Organizational Context

The annual management review at **Qmark International Certifications Pvt. Ltd.** includes discussions on internal and external factors, encompassing legal, technological, competitive, market, cultural, social, and economic environments at local, regional, national, and international levels, alongside internal factors such as company values, culture, performance, and knowledge, with the aim of regular monitoring and review through the development of a detailed matrix capturing both positive and negative aspects.



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Scope of Manual:

This manual is based on specific standards i.e. ISO Guide 65, and PGS Standards and is applicable for any product & process certification scheme that comes under the PGS India Certification program.

The specific requirement of each scheme is made separately in all procedures in it.

Mission of Qmark International Certifications Pvt. Ltd – QICS acknowledges the pivotal potential of Indian Agriculture in the global market. India possesses the capacity to pioneer novel avenues for marketing produce, both domestically and internationally, thereby fostering sustainable prosperity within the agricultural sector and bolstering the foundation of the farming industry, consequently augmenting the State's Per Capita Income. Our mission at QICS is to collaborate with distinguished professionals and validated technologies to realize this vision, catalyzing a fruitful and synergistic partnership among all stakeholders to transform Indian Agriculture.

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2.2 Distribution List of Controlled copy

S.No.	Copy holder	Designation	Hard Copy/Soft Copy
1.	Authorized person	Directors	Hard Copy
2.	Staff copy	Executive Quality Assurance / HR Manager	Soft Copy
3.	NCOF	National Center for Organic Farming (PGS Secretariat)	Soft Copy

Note: PDF copy of controlled copy is accessible to staff on shared computer.



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OP-01

Management of Impartiality

Purpose: To determine all threats to impartiality at all level of certification process.

Scope: To control/ prevent the threats to impartiality at all level of certification process.

Responsibility: Impartiality committee, relevant staff

Procedure:

A. COMMITTEE:

1. Impartiality committee consists experts from various interests that consists followings:
 - a. Chief Executive Officer of Qmark International Certifications Pvt. Ltd .
 - b. Managing Directors/ Alternate Director Qmark International Certifications Pvt. Ltd .
 - c. Education Sector
 - d. A legal expert.
 - e. Regulatory body/ may be a retired person.
 - f. Production sector (Food Manufacturing company/Agriculture sector)
 - g. Qmark International Certifications Pvt. Ltd . Certified Clients

Person responsible for provision of adequate resources for certification activities:

1. Chief Executive Officer, Qmark International Certifications Pvt. Ltd . (primary)
2. Director(secondary)

2. Impartiality committee Minutes of Meeting (MOM):

a. Agenda/Inputs for Minutes of Meeting (MOM) covers:

- Reviewing the policies & its effectiveness relating to impartiality of its certification activities
- Results of risk analysis for impartiality & their mitigation measures
- Review of finances and sources of income; to evaluate that on an ongoing basis, commercial, financial or other pressures do not compromise its impartiality
- Review of matters affecting confidence in certification, including openness and public perception



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- Review of the impartiality of the audit, certification and decision making processes of Qmark International Certifications Pvt. Ltd .
- Follow up actions of previous MOM's
- Changes affecting the Management of Impartiality

A record of each meeting will be kept by a designated note-taker. Note taking will revolve to each member of the committee / group.

b. Frequency: Once in a year

c. Rights & duties of Impartiality committee:

- To access all information necessary to enable it to fulfill its function; for this purpose regular information on impartiality & related issues (like financial status, details of complaints/appeal & complaint/ appeal handling etc.) is provided to committee members.
- If Qmark International Certifications Pvt. Ltd . does not respect the advice of this committee, the committee can take an independent action, e.g. informing authorities, accreditation bodies, stakeholders etc. in taking independent action, committees must respect the confidentiality requirements relating to the Qmark International Certifications Pvt. Ltd . & its applicant/ certified operator.
- Monitoring appeals and Complaints, if required.

d. Quorum of Impartiality committee:

At least 4 members from the impartiality committee shall be present (video conferencing is also considered as presence) while minutes of meeting for impartiality in order to review & take important decisions on impartiality policy, procedures & their implementation.

(Here Chief Executive Officer and Director of Qmark International Certifications Pvt. Ltd . are considered as single identity)

e. Consent by Impartiality committees:

Based on the number of voting, votes of at least two-thirds of the members present will be taken as consent.

To ensure that impartiality is both maintained and can be demonstrated:

MANAGEMENT OF IMPARTIALITY:

1. Qmark International Certifications Pvt. Ltd . considers following threats to impartiality:
 - a. Self-interest threats: threats that arise from a person or body acting in their own interest. A concern related to certification, as a threat to impartiality, is financial self-interest.
 - b. Self-review threats: threats that arise from a person or body reviewing the work done by themselves. Auditing the management systems of an applicant to whom the certification body provided management systems consultancy would be a self-review threat.



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- c. Familiarity (or trust) threats: threats that arise from a person or body being too familiar with or trusting of another person instead of seeking audit evidence.
- d. Intimidation threats: Threats that arises from a person or body having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.

Following principals are maintained:

- a. Qmark International Certifications Pvt. Ltd . Certificates are only issued after review by an independent authorized and competent member of the management team to ensure that no interest shall predominate
- b. Qmark International Certifications Pvt. Ltd . does not offer (and has never offered) any internal audit service to companies or individuals.
- c. Qmark International Certifications Pvt. Ltd . services do not have any interests & will not be linked with the activities of an organization (financially or otherwise) that provides management system consultancy. If it is known that any organization had linked its activities with Qmark International Certifications Pvt. Ltd . services, action will be taken to rectify the same.
- d. Qmark International Certifications Pvt. Ltd . does not have (and will not form) any relationships with companies who offer consultancy, internal audit services or other services that can be construed as having an impact on the certification services provided by Qmark International Certifications Pvt. Ltd . Any proposed relationship between Qmark International Certifications Pvt. Ltd . and any other company will undergo a risk assessment by the Committee for Impartiality prior to that relationship being formalized.
- e. Any current relationships with companies, organizations and individuals will be risk assessed on a regular basis to ensure that the relationship does not impact upon the impartiality of the certification process. The risk assessment will be undertaken by the Committee for Impartiality.
- f. Individuals employed by or otherwise contracted to Qmark International Certifications Pvt. Ltd . are required to document and record their current and past relationships with all companies. Any situation past or present which may present a potential conflict of interest is required by Qmark International Certifications Pvt. Ltd . to be declared. Qmark International Certifications Pvt. Ltd . will use the information to identify any threats to impartiality and will not use that individual in any capacity unless they can demonstrate that there is no conflict of interest. The risk assessment will be undertaken by the Committee for Impartiality.
- g. The risk assessment will be reviewed by the Committee for Impartiality.
- h. Qmark International Certifications Pvt. Ltd . services do not have any interests & will not be linked with the activities of an organization (financially or otherwise) that provides management system consultancy. If it is known that any person or organization is making inappropriate claims stating or implying that certification would be simpler, easier, faster, or less expensive, than that person or organization will be warned for doing so & if required, legal action will be taken.



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- i. All employees will be reviewed at least annually to ensure that they remain impartial when conducting audits.
 - j. Auditors and others involved in the certification process are not and will not be put under any pressure (e.g. targets to increase clientele, any financial pressure etc.) and will not be influenced in any way to come to a particular conclusion regarding the result of an audit.
 - k. Qmark International Certifications Pvt. Ltd. retains authority of certification decisions.
 - l. If auditor has delivered any Management System training, including Organic, NOP, NPOP, PGS etc., or any other training to an organization, he or she cannot be involved in certification process of that organization for next six months from the date of training.
 - m. To avoid familiarity threat, auditors are reshuffled at regular time frames, i.e. an auditor cannot audit same organization for more than 2 years or two audits.
 - n. Qmark International Certifications Pvt. Ltd. does not pay any commissions or does not give any targets to anybody, for example any staff, applicant/ certified operator, marketing agencies, consultants etc.
2. Qmark International Certifications Pvt. Ltd. requires personnel; internal and external; to reveal any situation known to them that may present them or the certification body with a conflict of interests. This is done as follows:
- a. policy is made known to them while appointment
 - b. if required, investigation is done by our contacts in industries.
 - c. while recruitment, details regarding the organizations that employ them or any projects in which they have involve previously will be taken in a prescribed format for resume or log sheets.
 - d. Before audit, auditor, reviewer, technical expert or any external expert (including auditor, reviewer or technical expert) will have to give details about non conflict of interest & make a commitment for it by signing a conflict of interest form.
 - e. before audit, audit team members are selected & appointed as per the procedure
 - f. After audit, the auditor feedback form is taken by auditee.
 - g. Verbal feedback from Co-auditors (audit team members) is also taken

Apart from above requirements, all employees of Qmark International Certifications Pvt. Ltd., permanent or empanelled, have to sign Qmark International Certifications Pvt. Ltd. conflict of interest declaration (Qmark International Certifications Pvt. Ltd. 112,) Confidentiality form (Qmark International Certifications Pvt. Ltd.) at the time of appointment.

Qmark International Certifications Pvt. Ltd. will use this information as input for identifying threats to impartiality raised by the activities of such personnel or by the organizations that employ them, and will not use such personnel, internal or external, unless they can demonstrate that there is no conflict of interests.

3. Also, Qmark International Certifications Pvt. Ltd. has identified, analyzed & documented the possibilities for conflict of interests arising from provision of certification including any conflicts arising from its relationship in the risk analysis chart.

Note: All certification activities are completed in a planned manner and the complete procedure is provided in 'audit procedure' & 'certification procedure'.



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OP-02

Application Process

Note: Application process will be run through the PGS India web Portal.

Purpose: To provide a procedure to receive certification applications from applicants.

Scope: To cover the certification requirements to be received from applicant along with application.

Responsibility: Quality Assurance, Inspectors, Reviewers, persons involved in certification.

Procedure:

A. Steps for submitting application:

1. An applicant contact Qmark International Certifications Pvt. Ltd . office through email, by post or visiting Qmark International Certifications Pvt. Ltd . office or any other communication medium. He/She can provide basic information about his/her operation either through email or by filling initial enquiry form.
2. On receiving an inquiry, Qmark International Certifications Pvt. Ltd . sends an offer for its services along with the scale of fees.
3. Upon request, Qmark International Certifications Pvt. Ltd . sends a detailed application package including the application form, certification agreement, and procedure for making online entieis under PGS India web portal etc. and procedure for related PGS certification services.

B. Application for certification

All applicants must submit the PGS Certification Application that includes the requirements listed in PGS Standards & procedures. Additional forms to be submitted may include: Field History Form, Crop details, Farm Products and Area proposed under PGS certification. The initial review of documents verifies that all necessary information has been submitted in Application form.

All applicants/Local Groups for PGS certification must sign a Certification Agreement as per the PGS standards that includes the requirements listed in PGS India Certification extended guidelines.

1. An application includes the following as a minimum:
 - a) The scope of the desired certification;



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b) The statement that the applicant agrees to comply with the requirements for certification and to supply any information needed for evaluation of products to be certified.

2. The applicant, as a minimum, shall provide the following information:

- a) corporate entity, name, addresses, and legal status;
- b) a list of the products to be certified and the standards against which each product is to be certified if known to the applicant.

Right to Withdraw Application

The *Certification Application* informs applicants of their right to withdraw their application at any time. Applicants must request withdrawal in writing. Fax and email are acceptable methods of notification. The withdrawal will be effective at the time and date it is received by Qmark International Certifications Pvt. Ltd.

Non-Discriminatory policy of Qmark International Certifications Pvt. Ltd.:

Qmark International Certifications Pvt. Ltd . will not discriminate on the basis of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, or marital or family status. Qmark International Certifications Pvt. Ltd . will accept all production or handling applications that fall within its area(s) of accreditation and certify all qualified applicants, to the extent of its administrative capacity to do so without regard to size or membership in any association or group.

Language policy of Qmark International Certifications Pvt. Ltd .:

The official language of Qmark International Certifications Pvt. Ltd . is English. Any party wishing to do business with Qmark International Certifications Pvt. Ltd . in another language must provide translation for personnel and documentation. However, Qmark International Certifications Pvt. Ltd . may conduct business in all languages provided that documentation submitted to Qmark International Certifications Pvt. Ltd . can be translated into English.



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OP-03 Review of Application

Purpose: To review the application of the applicant.

Scope: Review of all applications received for organic certification.

Responsibility: Initial Reviewer.

Procedure:

After an application is received, it must be reviewed to verify that it meets the following requirements:

- the requirements for certification are clearly defined, documented and understood;
- any difference in the understanding between Qmark International Certifications Pvt. Ltd. and the applicant is resolved; and
- ensure that the application is complete as required in PGS guidelines;
- A determination of whether the Local Group appears to comply or may be able to comply with the applicable requirements of the PGS India standards; and
- Verification that an applicant who previously applied to another certifying agent and received a notification of noncompliance or denial of certification has submitted documentation to support the correction of any non-compliance identified in the notification of noncompliance or denial of certification.

The review of the application will take place within a reasonable time after receipt of the application. After the review is complete the applicant will be notified of any findings.

If the application meets the requirements, approval of Organic System Plan will be send and an on-site inspection of the operation will be scheduled.

The initial review may be done by the same person who conducts the onsite inspection.

Application from applicant will be reviewed by Initial reviewer as per Specific Standard.

- Application for grower group certification will be done on the basis of guidelines as described in PGS guidelines.
- All the Residual Test will be conducted at NABL (ISO-17025) and APEDA approved Laboratory only



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OP- 04

Procedure for Inspection and Granting, Denial, Recertification, Maintaining & Re-Evaluation of Certification

Purpose: The purpose of this procedure is to make outlines for Inspection and certification as per specific standard.

Scope: This procedure includes guidance for:

1. On- Site Inspection,
2. Conditions for on-site inspection
3. Exit Interview & Findings of Inspection
4. Secondary Review & Granting certification
5. Denial of certification & Non Compliance
6. Maintaining Certification:
 - Application for recertification
 - Continuation of certification
 - Re-evaluation of Certification
 - Surveillance Activities:

Responsibility: Chief Executive Officer, Director, Inspector, Reviewer

Procedure:

2. On-site inspections

On-site inspection

An initial on-site inspection will be scheduled as soon as practical after the initial review indicates the operation's ability to comply. Annual on-site inspections will continue to be conducted for as long as the operation continues certification with Qmark International Certifications Pvt. Ltd ..

The initial on-site inspection is normally scheduled as soon as possible after the completion of the review. However, it may be delayed up to six months so that the inspection may be conducted when the land, facilities, and activities that demonstrate compliance or capacity to comply can be observed. A short delay may also be allowed to permit the consecutive scheduling of several inspections in close proximity to each other.

Special types of on-site inspection:

a. Additional (follow up) on site inspection

Additional on-site inspections conducted as needed to determine compliance with the regulations if the initial inspection reveals significant non compliances. The operator will be responsible for the cost of follow-up inspections that are necessary to verify compliance.

Selection of projects will be done on the basis of Risk Analysis; criteria for conducting an Additional inspection of an operation may include, but are not limited to:



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- i. Previous non compliance issues
- ii. Complaints
- iii. Organic & Non-organic production or handling, especially of visually indistinguishable varieties
- iv. Risk of contamination from adjoining land use or commingling or contamination during handling
- v. Complexity of operation

Additional inspections may be announced or unannounced depending upon the requirement and reason for additional inspection.

Reference :- Additional Inspection Policy.

b. Unannounced inspections

Random unannounced inspections may also be conducted to verify continued compliance with the regulations. Qmark International Certifications Pvt. Ltd . is responsible for the cost of unannounced inspections. The unannounced inspection will be carried out on at least 10% of the certified operations each year for each accredited program(NPOP and NOP).In case a operator accredited for both program, unannounced inspection can be done for one or both. Selection is based on risk assessment. Additional inspections may be announced or unannounced at the discretion of Qmark International Certifications Pvt. Ltd . or as required by the APEDA or NCOF.

c. Certification of Local Groups as per PGS Standards:

The certification of grower groups will adhere to the NPOP Section 5 and NOSB Recommendation:

Criteria for Certification of Grower Groups:-Grower Groups will be expected to submit the information requested on the Qmark International Certifications Pvt. Ltd. including a completed Application form as per the PGS portal. The initial review process will utilize the Initial Administrative & Technical Review Checklist and recommendations of Inspector who have undertaken the physical verification before the acceptance of the Local groups.

d. Temporary Variances

When an applicant/ certified operator indicate to Qmark International Certifications Pvt. Ltd . that one of the following conditions exists, Qmark International Certifications Pvt. Ltd . will review the situation and, if warranted, may recommend in writing to the PGS Administrator that a temporary variance be established.

1. Natural disasters declared by Govt. of India or State Govt.;
2. Damage caused by drought, wind, flood, excessive moisture, hail, tornado, earthquake, fire, or other business interruption; and
3. Practices used for the purpose of conducting research or trials of techniques, varieties, or ingredients used in organic production or handling.



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Upon notification from the NCOF, Qmark International Certifications Pvt. Ltd . will identify each operation to which the variance applies and send written notice to each applicant/ certified operator. Notice may be provided by telephone or email in urgent situations.

Note:

- In the event of natural disasters declared by the Govt. of India or the state Govt. where the operation is situated or other conditions listed above.
- The information will also be send to competent authority of NCOF for the Information and necessary permissions.
- Upon getting the confirmation from NCOF office that a temporary variance has been established, Qmark International Certifications Pvt. Ltd . will identify each operation to which the variance applies and send written notice to each applicant/ certified operator. Notice may be provided by telephone or email in urgent situations.

3. Conditions for on-site inspection

- a) On-site inspections are to be conducted when an authorized representative of the operation who is knowledgeable about the operation is present. Inspections are to be scheduled at a time when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the production and handling requirements can be observed. These requirements do not apply to unannounced on-site inspections.
- b) Qmark International Certifications Pvt. Ltd . will provide the inspector, prior to each on-site inspection, with previous on-site inspection reports, organic system plans, supporting documents, and other information that must be verified by the inspector.
- c) The inspector's evaluation ensures that the on-site inspection of an operation verifies:
 - The operation's compliance or capability to comply with the regulations;
 - That the information, including the organic production or handling system plan, accurately reflects the practices used or to be used by the applicant or by the certified operation; and
 - That prohibited substances have not been and are not being applied to the operation through means which, at the discretion of the certifying agent, may include the collection and testing of soil; water; waste; seeds; plant tissue; and plant, animal, and processed products samples.

4. Exit Interview & Findings of Inspection:

a. Exit Interview:

The inspector must conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector must address the need for any additional information as well as any issues of concern. The inspector must provide the operation's authorized representative with a receipt for any



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samples taken by the inspector during the inspection. Inspectors will not be charged for the samples taken.

b. Findings of Inspection:

The inspector will compile all inspection findings, including compliance and non-compliance issues, observations, and opportunities for improvement, along with objective evidence, into an inspection report to be disseminated to the group leaders of their respective Local groups.

Qmark International Certifications Pvt. Ltd . will notify the inspector of its decision regarding certification of the production or handling operation site inspected by the inspector and of any requirements for the correction of minor noncompliance.

c. Non-Conformities:

If non-conformities are found during the audit, a corrective action request form is provided to applicant/ certified operator to comment on the nonconformities and a corrective actions plan will be decided in consultation with the applicant/ certified operator who should submit the corrective action report to Qmark International Certifications Pvt. Ltd . upon closure of the non conformities.

If there is any major non –conformity found during the inspection, then effectiveness of the corrective action may verified by an on-site follow up inspection.

Note: - An on-site inspection will be performed during the conversion period, as soon as possible after receiving the application. Before completion of conversion period and taking the certification decision, a final inspection will be done.

5. Secondary Review & Granting certification

Qmark International Certifications Pvt. Ltd . does not delegate authority for granting, maintaining, extending, suspending or withdrawing certification to an outside person or body.

The applicant's file will undergo review promptly following the reception of the on-site inspection report, analysis outcomes of any samples obtained, and any supplementary information provided by or requested from the applicant, within the premises of Qmark International Certifications Pvt. Ltd.

Certification is granted based on the basis of the information gathered during the evaluation process and any other relevant information on verifying followings:

- The applicant is in compliance with its organic system plan and all procedures;
- The activities of the applicant's operation are in compliance with the regulations; and
- The applicant is able to conduct operations in accordance with the plan.

The certification decision may include requirements for the correction of minor non-compliances within a specified time period as a condition of continued certification.

If certification is granted, a certificate of organic operation will be issued which specifies the:



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- Name and address of the Local Groups
- For PGS Certification Effective date of Initial certification, Date of Next inspection, date of validity of Certificate;
- Date to Certificate Valid for a year for date of issuances.
- Categories of organic operation, including crops, livestock, or processed products produced by the certified operation; and
- Name, address, and telephone number of the certifying agent.
- Certification Committee of Qmark International Certifications Pvt. Ltd . will take decisions on files. Decision on Certification will be by Majority.
- PGS certificates will be issued through PGS India web portal developed by NCOF.

I. Denial of certification & Non Compliance

If certification cannot be granted based on a review of the information specified in PGS guidelines, Qmark International Certifications Pvt. Ltd . will provide a written notification of noncompliance to the applicant including:

- A description of each noncompliance;
- The facts upon which the notification of noncompliance is based; and
- The date by which the applicant must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.

When correction of a noncompliance is not possible, a notification of noncompliance and a notification of denial of certification may be combined in a single notification.

The notification will inform applicants that they may respond to a denial of certification by:

- Correcting non-compliances and submitting a description of the corrective actions taken with supporting documentation;
- Correcting non-compliances and submitting a new application to another certifying agent, which includes a complete application, the notification of noncompliance received from the first certifying agent, and a description of the corrective actions taken with supporting documentation; or
- Submitting written information to the Local groups leader to rebut the noncompliance described in the notification of noncompliance.

After issuance of a notification of noncompliance, Qmark International Certifications Pvt. Ltd . will:

- Evaluate the applicant's corrective actions and supporting documentation or the written rebuttal, and then conduct an on-site inspection if necessary and then:
 - Issue the applicant an approval of certification, when the corrective action or rebuttal is sufficient for the applicant to qualify for certification, or
 - Issue the applicant a written notice of denial of certification when the corrective action or rebuttal is not sufficient for the applicant to qualify for certification.
- Issue a written notice of denial of certification to an applicant who fails to respond to the notification of noncompliance.



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- Provide notice to the NCOF / PGS Secretariat that certification has been granted or denied.

The notice of denial of certification will state the reason(s) for denial and the applicant's right to:

- Reapply for certification refer to respective RCOF.
- Request mediation pursuant to PGS India program or, if applicable, pursuant to a State organic program; or
- File an appeal of the denial of certification pursuant to PGS Secretariat.

Qmark International Certifications Pvt. Ltd . will treat the new application from an operation that includes a notification of noncompliance or a notice of denial of certification as a new application and begin a new application process.

If Qmark International Certifications Pvt. Ltd . has reason to believe that an applicant has willfully made a false statement or otherwise purposefully misrepresented the applicant's operation or its compliance with the certification requirements, Qmark International Certifications Pvt. Ltd . may deny certification without first issuing a notification of noncompliance.

II. Maintaining Certification:

i. Application for recertification

An operation that is currently certified by another accredited certifier may request recertification by Qmark International Certifications Pvt. Ltd . In addition to providing all of the information required of the new applicant, an operation requesting recertification must also provide a copy of their most current inspection report along with any corrective actions taken as a result of a notice of noncompliance.

Applicant also needs to withdraw the application from its previous certifier. After receiving the withdrawal letter from applicant Qmark International Certifications Pvt. Ltd . will inform to previous certifier along with request to inform about any issue or non compliance notice to the applicant. Qmark International Certifications Pvt. Ltd . will also inform to NCOF about the change of certifier by applicant. Qmark International Certifications Pvt. Ltd . will wait for 2 weeks for the response of previous certifier after notification; in case no response is received from previous certifier Qmark International Certifications Pvt. Ltd. will initiate its certification process. An applicant also needs to apply for NOC in writing. Project will be transferred through PGS portal only.

Reference: - Qmark International Certifications Pvt. Ltd . Policy for Transfer of project.

ii. Continuation of certification

A certified operation must pay annual certification fees and submit the following information, as applicable.

- An updated organic production or handling system plan which includes:



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--A summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the previous year's organic system plan during the previous year; and

--Any additions to or deletions from the previous year's organic system plan, intended to be undertaken in the coming year.

- Any additions to or deletions from the information regarding the name, address, and phone numbers provided in the original application.
- An update on the correction of minor non-compliances previously identified by the certifying agent as requiring correction for continued certification.
- Other information as deemed necessary by Qmark International Certifications Pvt. Ltd . to determine compliance with the regulations.

Qmark International Certifications Pvt. Ltd . will conduct an annual on-site inspection during the growing or production season of a farm operation or within a 60-day window on either side of the anniversary of the certified handling operation's initial inspection date. However, the anniversary date may be modified if there is a more optimal season within which to conduct the annual on-site inspection.

Note: Qmark International Certifications Pvt. Ltd . will issue a written notification of noncompliance if Qmark International Certifications Pvt. Ltd . has reason to believe, based on the on-site inspection and a review of the annual updated information, that a certified operation is not complying with the regulations. See the section titled "Noncompliance procedure for certified operations" for details.

Note: Qmark International Certifications Pvt. Ltd . will issue an updated certificate of organic operation when it determines that the certified operation is complying with the regulations and that any of the information specified on the certificate of organic operation has changed.

iii. Re-evaluation of Certification

Due to change in standards

In the event of significant changes to standards for certification, certified operators and applicants will be notified of the changes, the date those changes will be effective, and the deadline for demonstrating compliance to the new standards. The deadline for demonstrating compliance may be the regular annual inspection date or an earlier date if accelerated compliance is necessary to maintain organic integrity. Continued compliance will be evaluated when the requested information is provided by the applicant or certified operation.

Due to change in Certified Operation:

Certified operators are required in the Qmark International Certifications Pvt. Ltd . Certification Agreement to provide notice of significant changes to their organic management plan, ownership, or management structure that may affect compliance with the standards. When such notice is received, the certification will be re-evaluated to determine continued compliance with the regulations. Qmark International Certifications Pvt. Ltd . determines whether the announced changes require further investigations. If such is the case, the supplier is not allowed



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to release certified products resulting from such changes until Qmark International Certifications Pvt. Ltd . has notified the supplier accordingly.

Qmark International Certifications Pvt. Ltd . will issue an updated certificate of organic operation if the operation continues to comply and any of the information specified on the certificate of organic operation has changed.

iv. Surveillance Activities:

Qmark International Certifications Pvt. Ltd . staff will monitor products that indicate “Certified by Qmark International Certifications Pvt. Ltd .” to confirm that they conform to the standards. Staff will conduct such surveillance at trade shows and other Qmark International Certifications Pvt. Ltd . actions where products may be displayed or sold. A record of the surveillance activities will include the date, event, Qmark International Certifications Pvt. Ltd . correction, name of staff person, and description of products. These records will be filed at the Qmark International Certifications Pvt. Ltd . office.



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OP-05

Reports to the Accreditation Body

Purpose: To outline a procedure on reporting to the Accreditation Body

Scope: procedure on reporting to the Accreditation Body for Regional Council Inc.

Responsibility: Chief Executive Officer / Chief Operating Officer

Procedure:

Qmark International Certifications Pvt. Ltd.:

The Chief Executive Officer Qmark International Certifications Pvt. Ltd . will submit an annual report to . This NCOF annual report will contain an updated report on recent developments in the Inspection and Certification agencies program such as:

- Number of Local groups certified,
- Geographic area of operation,
- Changes in personnel,
- Compliance report in which compliance with imposed conditions is reported and
- Trainings conducted by the RC during the year.

Annual report, recordkeeping, and renewal of accreditation

Annual report will be submitted to NCOF on the format prescribed of NCOF and provide all the required information before the prescribed date. The reporting period will be from 1st April to 31st March each year.

Upon getting the notification from NCOF Qmark International Certifications Pvt. Ltd . will apply for renewal of accreditation on the application form prescribed by NCOF along with required fees and documents.

Chief Executive Officer / Director of Qmark International Certifications Pvt. Ltd . will prepare the following reports and fees. These will be submitted to NCOF.

- A complete and accurate update of application information and evidence of expertise and ability.
- Information supporting any changes being requested in the areas of accreditation.
- A description of the measures implemented in the previous year and any measures to be implemented in the coming year to satisfy any terms and conditions determined by the PGS secretariat to be necessary, as specified in the most recent notification of accreditation or notice of renewal of accreditation.
- The results of the most recent performance evaluations and annual program review and a description of adjustments to the certifying agent's operation and procedures implemented or to be implemented in response to the performance evaluations and program review.
- The required fees and any other information asked by NCOF.



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OP-06

Control of Documents & Control of Records

Purpose: To develop a procedure to control over the entire documentation & recordkeeping related to Organic Certification System of Qmark International Certifications Pvt. Ltd . as per PGS guidelines.

Scope: all documents & records which comes under the scope of Organic Certification System of Qmark International Certifications Pvt. Ltd . as per PGS guidelines.

Responsibility: Chief Executive Officer/Director Quality Manager

Procedure:

1. Documents:

- All documents and data are maintained on hard copy and soft copy.
- Allotment of unique identification number with issue number to each document as per numbering plan.
- All documents are approved by Chief Executive Officer.
- Soft copy is assessable to whole staff on office server.
- The issue, control and recall of all documents are carried out under the control of Chief Executive Officer & Quality Manager.

Control & Issue of Manuals & documents:

- Chief Executive Officer approves the Manuals as well as subsequent amendments.

Distribution of controlled documents:

- Hard copy of documents: Chief Executive Officer & can be accessed by staff (a register is maintained regarding the retrieval & submission of documents)
- Soft copy: Executive/Quality Manager.
- PDF Copy: Accessible to staff through server for reference

Changes:

- Any employee of Qmark International Certifications Pvt. Ltd . may request for modifications of documents, as per the field conditions specific requirements subject to proper justification.
- Modifying Documents after formal review by *Quality Manager*.
- Obtaining approval from approving authority (Chief Executive Officer) in Document change request form.
- Identifying changes: any changes done in documents are notified to staff through office notice.



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- Updated documents are then communicated or re-issue to staff after re-approval through document circulation notice

Document Structure:

Qmark International Certifications Pvt. Ltd . documents include the following:

1. Policies
2. Quality Manual
3. Procedure Manual
4. Personnel Policies & Job Description Manual
5. Guidelines
6. Formats

Description of documents:

a. Policies:

Describes policies and objectives of Qmark International Certifications Pvt. Ltd .

b. Manuals:

1. Quality Manual:

This manual is based on the requirements of ISO Guide 65, PGS standard.

2. Procedure Manual

This manual consist the operational procedure required to establish, implement & maintain the ISO Guide 65, & PGS standard's requirements.

3. Job description, criteria & responsibility

This document consists of the details of the basic requirements for appointing various staff in the terms of qualification, competence, experience etc.

Note: Latest revision date is mentioned in front page of manual.

a. Guidelines

These documents are developed to prepare the instruction to the inspector, reviewer and other related personnel so that they can easily get an idea to implement our procedures and use our formats for various activities.

Note: Issue date & latest revision date are mentioned in header.

b. Formats

Note: date of latest revision is mentioned in header of manual.

These documents consists all formats which are to be used for records while certification process.

System of document numbering:

The numbering system of Qmark International Certifications Pvt. Ltd . documents is very simple. It can be defined by taking a sample number of documents, as follows:

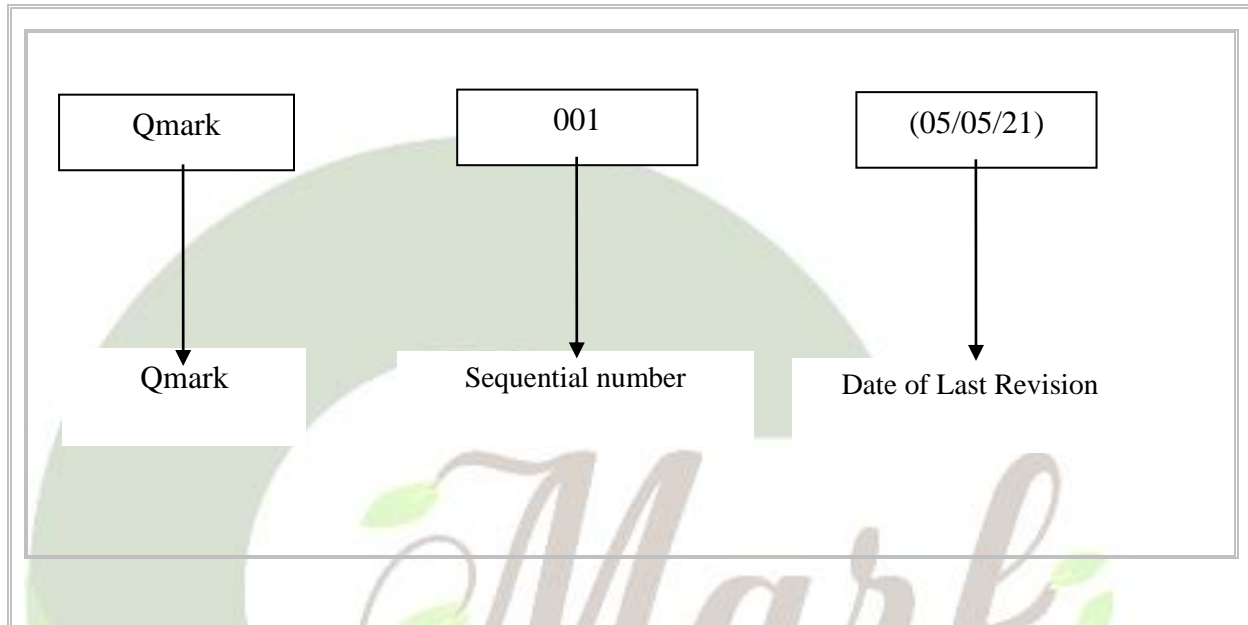


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Operational Procedure:



Formats:

Let have example of Qmark International Certifications Pvt. Ltd . 001(05/05/21):

Obsolete: A seal of 'Obsolete' is inscribed on the obsolete documents

Control of obsolete document:

Control: obsolete documents are retained in soft copy by Chief Executive Officer for 1 year for future reference.



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i. Disposition of Documents or Records:

After the retention period of obsolete documents they are disposed off. The manner of disposition depends on the sensitivity of the data and information contained in it.

Documents with confidential data are destructed by tearing them.

Other documents can be disposed by selling them as solid waste.

ii. Preservation of Documents & Records:

Documents are preserved in such a way that they are readily accessible and do not get damaged. They are stored in shelves & thus protected from insect/pest's damage, dampness and seepage. Shelves are kept locked and can be accessed only by authorized persons or if permitted by chief Executive Officer or Quality Manager.

Documents are maintained in both soft & hard copy. Backup of data in soft copy is taken in server and in a separate hard disk.

Hard disk is kept by Chief Executive Officer in a place other than office, so that in case of fire or any destructive situation, documents are kept safe.

iii. Record keeping

Records obtained from applicants for certification and certified operations, records created by Qmark International Certifications Pvt. Ltd . regarding applicants for certification and certified operations, and records created or received by Qmark International Certifications Pvt. Ltd . pursuant to accreditation requirements will be maintained for at least 10 years beyond their creation or receipt.

OP-07

Procedure for Complaint, Suspension and Review Qmark International Certifications Pvt. Ltd .

Purpose: To establish and maintain, an effective procedure, for handling the complaints related to operator's certification.

Scope: complaints regarding Qmark International Certifications Pvt. Ltd . operation and/or procedures; the auditors, reviewers, staff of the Qmark International Certifications Pvt. Ltd .; certified operator; misuse of accreditation or certification status either in scope or in use of the logo or mark

Responsibility: Chief Executive Officer & Quality Manager

Complaints represent a source of information as to possible nonconformity. A Complaint can be made by any person or body against the following:



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- A. Qmark International Certifications Pvt. Ltd ., its operation and/or procedures
- B. the auditors, reviewers, committee members, staff of the Qmark International Certifications Pvt. Ltd .
- C. Certified operator.
- D. Misuse of accreditation or certification status either in scope or in use of the logo or mark.

1. Receiving, validating & recording of complaints:

The complaints can be received on our website, through e-mail, by post, by hand or by any other possible means of communication and it can be done by any person; including our applicant/certified operator, any stake holders, a person other than operator, certified operator's customers or any other person; related the scope of organic certification (PGS standards).

Upon receipt of a complaint, the Qmark International Certifications Pvt. Ltd . confirms whether the complaint relates to certification activities that it is responsible for and, if so, shall deal with it. If the complaint relates to a certified operator, then examination of the complaints shall consider the effectiveness of the certified Operation.

Any complaint about a certified operator will also be referred by the certification body to the certified operator in question at an appropriate time, which can be a week to three weeks, depending on the severity of the complaint.

Complaints or appeals received from any party on all other matters will be handled by the Qmark International Certifications Pvt. Ltd . Chief Executive Officer (in case if CEO is involved in any certification activity related to complaint then MD will handle the complaint). Cases involving certification requirements of the may be referred to one or more reviewers for additional evaluation. Those reviewers will not have been involved in earlier review or audit of the contested case. Cases involving certification decisions of other certification agencies will be referred to those agencies. All other matters will be investigated and decided by the Chief Executive Officer who will determine appropriate subsequent action.

After receiving the complaints Qmark International Certifications Pvt. Ltd . will be responsible for gathering and verifying all necessary information to validate the complaint.

2. Procedure for complaints regarding:

- A. Qmark International Certifications Pvt. Ltd ., its operation and/or procedures
- B. the auditors, reviewers, staff of the Qmark International Certifications Pvt. Ltd .

The Qmark International Certifications Pvt. Ltd . CEO will be responsible for the investigation of complaints. Investigation of complaints of noncompliance with the regulations can include unannounced inspections, sampling, or any other method intended to assess the veracity of the complaint. The procedure to address a compliant will be as follows:-

- a. When a complaint has been received, the Chief Executive Officer along with reviewer and Quality Manager evaluate the complaint (Persons investigating the compliant should not be involved in operation under investigation). Appropriate technical experts may be co-opted to assist, where necessary.



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- b. The decision to be communicated to be the complainant will be made by, or reviewed and approved by individual(s) not previously involved in the subject of the complaint.
- c. A log of complaints will be maintained in a way that will allow tracking and recording, it will also include actions undertaken to resolve them.
- d. The corrective actions taken will also be verified for their effectiveness.
- e. Whenever possible, Qmark International Certifications Pvt. Ltd . will acknowledge receipt of the complaint, and will provide the complainant with progress reports and the outcome.
- f. Operator should inform about the closure of the complaint to Qmark International Certifications Pvt. Ltd ..
- g. Qmark International Certifications Pvt. Ltd . will give formal notice of the end of the complaints handling process to the complainant.
- h. Qmark International Certifications Pvt. Ltd . will determine, together with the certified operator and the complainant, whether and, if so to what extent, the subject of the complaint and its resolution shall be made public.
- i. No certification will be suspended or withdrawn unless there is major deviations under PGS guidelines.
 - Served at least three weeks' written notice to the certified operator, from the date of notification, stating the grounds for the suspension or withdrawal; and
 - Considered any written appeal from the certified operator received during these two weeks.
 - If no respond in this time period then a next written notice of 2 weeks is issued to the certified operator, from the date of notification.
 - A last notice of 1 week is issued if the certified operator does not respond to the previous notices.
 - The certified operator must reply within the defined time period. He should mention the proposed corrective action & the time limit to accomplish it.
 - The corrective actions taken by the certified operator will also be verified for their effectiveness.
 - Whenever possible, Qmark International Certifications Pvt. Ltd . will acknowledge receipt of the complaint, and will provide the complainant with progress reports and the outcome.
 - Certified operator should inform about the closure of the complaint to Qmark International Certifications Pvt. Ltd .*
 - Qmark International Certifications Pvt. Ltd . will give formal notice of the end of the complaints handling process to the complainant.
 - Qmark International Certifications Pvt. Ltd . will determine, together with the certified operator and the complainant, whether and, if so to what extent, the subject of the complaint and its resolution shall be made public.



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- j. Qmark International Certifications Pvt. Ltd . will evaluate the complaints relating to customer by reviewing records of previous audits or if necessary, re- auditing the certified operator, by conducting the special/ surprise inspection.
- k. All cases involving detection of Prohibited material need on inspection.

3. Investigation Procedure of Certified Operation:-

During the investigation of Complaint, if a noncompliance is confirmed, the noncompliance procedure for certified operations will be followed.

Noncompliance procedure for certified operations:-

- a. If certification cannot be continued for a certified operation based on a review of information received from or about the operation, Qmark International Certifications Pvt. Ltd . will provide a written notification of noncompliance to the certified operation including:
 - A description of each noncompliance;
 - The facts upon which the notification of noncompliance is based; and
 - The date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.
- b. The notification will inform the certified operation that they may respond by:
 - Correcting noncompliance and submitting a description of the corrective actions taken with supporting documentation;
 - Correcting noncompliance and submitting a new application to another certifying agent, which includes a complete application, the notification of noncompliance received from the first certifying agent, and a description of the corrective actions taken with supporting documentation; or
 - Submitting written information to the issuing certifying agent to rebut the noncompliance described in the notification of noncompliance.
- c. The notification will also inform operators that in addition to suspension or revocation, any certified operation that:
 - Knowingly sells or labels a product as organic, except in accordance with the Act, shall be subject to action as per Indian Panel Code.
- d. After issuance of a notification of noncompliance, Qmark International Certifications Pvt. Ltd . will:
 - Evaluate the applicant's corrective actions and supporting documentation or the written rebuttal, and then conduct an on-site inspection if necessary and then:
 - --Issue the applicant a written notice of noncompliance resolution and an approval of certification, when the corrective action or rebuttal is sufficient for the applicant to qualify for certification, or
 - Issue the applicant a written notice of proposed suspension or revocation of certification when the corrective action or rebuttal is not sufficient for the applicant to qualify for certification.



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- Issue a written notice of suspension or revocation of certification to an applicant who fails to respond to the notification of noncompliance.
- e. When correction of a noncompliance is not possible, a notification of noncompliance and a notification of proposed suspension or revocation of certification may be combined in a single notification.
- f. A notice of proposed suspension or revocation of certification will include:
 - The reasons for the proposed suspension or revocation;
 - The proposed effective date of such suspension or revocation;
 - The impact of a suspension or revocation on future eligibility for certification; and
 - The right to file an appeal.
- g. If Qmark International Certifications Pvt. Ltd . has reason to believe that a certified operation has **willfully violated** the regulations, Qmark International Certifications Pvt. Ltd shall send the certified operation a notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance.
- h. If the certified operation fails to correct the noncompliance, to resolve the issue through rebuttal, or to file an appeal, Qmark International Certifications Pvt. Ltd will send the certified operation a written notification of suspension or revocation. A notification of suspension or revocation will not be sent to a certified operation that has filed an appeal, while final resolution is pending.
- i. Qmark International Certifications Pvt. Ltd will treat the new application from an operation that includes a notification of noncompliance or a notice of denial of certification as a new application and begin a new application process.
- j. A notice of suspension will include the following information:
 - A certified operation whose certification has been suspended under this section may at any time, unless otherwise stated in the notification of suspension, submit a request to the PGS secretariat for reinstatement of its certification. The request **must** be accompanied by evidence demonstrating correction of each noncompliance and corrective actions taken to comply with and remain in compliance with the regulations.
- k. A notice of revocation will include the following information:
 - A certified operation or a person responsibly connected with an operation whose certification has been revoked will be ineligible to receive certification for a period of 5 years following the date of such revocation (PGS) or go through complete conversion period as per PGS guidelines. The INM/NCOF may, when in the best interest of the certification program, reduce or eliminate the period of ineligibility.



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4 'Misuse of accreditation or certification status either in scope or in use of the logo or mark':

For the complaints regarding use of PGS logo or misinformation about the Regional Council i.e. Qmark International Certifications Pvt. Ltd, conditions for use of PGS Logo will be referred.

Procedure for this type will be same as procedure for complaint.

5. Compliant regarding the Qmark International Certifications Pvt. Ltd Staff:-

Compliant regarding the Qmark International Certifications Pvt. Ltd staff will be handled by CEO. If a staff was found violating the confidential policy and do not respect the code of conduct, appropriate action will be taken as Qmark International Certifications Pvt. Ltd COI policy.

Note:

- 1. All kinds of complaints will be handled or reviewed by one or more persons and will be kept confidential.**
- 2. In case, if complainant is not satisfied by our decisions, then complaint will be transferred to Qmark International Certifications Pvt. Ltd . Impartiality Committee.**
- 3. Effected Operator against whom action was taken may appeal against Qmark International Certifications Pvt. Ltd . Decision as per appeal process.**



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OP-o8

Inspection and testing of agricultural product to be sold or labeled “PGS organic”

Purpose: To outline a procedure for inspection and testing of agricultural product to be sold or labeled “PGS organic”

Scope: For all certified licensee/ operators

Responsibility: Inspector, Reviewer

Procedure:

All organic agricultural products **must** be made accessible by certified operations for examination by the NCOF the applicable State official, or representatives of Qmark International Certifications Pvt. Ltd .

The NCOF, applicable governing State official, or Qmark International Certifications Pvt. Ltd . may **require** pre-harvest or post-harvest testing of any agricultural **input** used or **organic product** when there is reason to believe that the agricultural input or product has come into contact with a prohibited substance or has been produced using excluded methods. The tests will be conducted by the applicable governing State official or Qmark International Certifications Pvt. Ltd . at their own expense, if Qmark International Certifications Pvt. Ltd . will take samples due to suspicion on operation, this applicable to standards operation only. Testing fee will be borne by the operators/Local groups or if required Qmark will bear the cost from its own funds.

When testing is required, an inspector along with representative of Local Groups or applicable governing State official and Qmark International Certifications Pvt. Ltd . **must** collect the pre-harvest or postharvest tissue test samples.

--Sample integrity **is** maintained throughout the chain of custody.

--Residue testing **is** performed in an accredited laboratory at such time that an appropriate laboratory becomes accredited.

--Chemical analysis is made in accordance with the methods described in the most current edition of the Official Methods of Residue Analysis or other applicable validated methodology determining the presence of contaminants in agricultural products. The laboratory must be NABL or ISO-17025 and APEDA accredited.

Qmark International Certifications Pvt. Ltd . will sample and test at least 3 samples per 5 Local groups on annually basis or on the basis of risk assessment analysis.

Test results will be provided to NCOF or the State governing official as and when required by them. If the test results exceed acceptable levels, the results will be reported immediately to operator and further action will be taken as per applicable standards.



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Author: Mr. Ratnesh Singh	Standard Operating Manual	Issue - 0
Approval: Mr. Ranjan Baruah	PGS Certification	Page No. 33 of 54 Effective: 05/05/2021

OP- 09

Qmark International Certifications Pvt. Ltd . Procedure for Handling Appeals

Purpose: To make a procedure for handling appeals from the certified operator.

Scope: All kinds of appeal that comes under the scope of the PGS certification.

Responsibility & Committee: Chief Executive Officer, Managing Director, Quality Manager, Reviewer, External Expert if required.

Procedure:

Qmark International Certifications Pvt. Ltd . has an appeals-handling process to enable its certified operators to appeal against the decision which does not result into acceptable resolution or where the proposed procedure is unacceptable to the appellant or other parties involved.

This appeals-handling process shall provide for an independent and impartial appeal process. Any certified operators can submit an appeal against the decisions taken by Qmark International Certifications Pvt. Ltd .

The appeal is only received through written or printed format.

Qmark International Certifications Pvt. Ltd . provides an option for the appellant to access its appeal-handling process through website or printed media.

It is also make sure that the personnel involved in the appeals-handling process are different from those who carried out the audits and made the certification decisions thereby maintaining its policy of impartiality.

The procedure for appeal is as follows:

1. Certified operators subject to the regulations who believe that they are adversely affected by a noncompliance or certification decision may appeal such decision to Chief Executive Officer Qmark International Certifications Pvt. Ltd . or the Chief Operating Officer Qmark International Certifications Pvt. Ltd . In case if the Chief Executive Officer, Qmark International Certifications Pvt. Ltd . will be involved in the certification decision of the organization which is appealing, then he will give the responsibility for handling appeal to the Executive Quality Assurance. If still the person making the appeal didn't satisfied then he/she can also appeal to the PGS Secretariat (NCOF) against Qmark International Certifications Pvt. Ltd. who will initiate handling of the appeal pursuant to appeal procedures. Appeal can be made in following cases
 - Persons subject to the regulations who believe they are adversely affected by a noncompliance decision of the PGS Certified Product's Inspector/Reviewer.



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- Persons subject to the regulations who believe that they are adversely affected by a noncompliance decision of a certifying agent.

Note:-If Chief Executive Officer and Chief Operating Officer both are involved in non compliance and decision making, appeal will be forwarded to impartiality Committee and will be handled in supervision of impartiality Committee by the Board of Directors.

2. All written communications between parties involved in appeal proceedings must be sent to the recipient's place of business by a delivery service which provides dated return receipts.
3. A certified operator can appeal within 30 days of receiving the decision letter from Qmark International Certifications Pvt. Ltd ., or within the time frame specified in that letter— whichever is later. Unless the appeal is timely, the decision to deny, revoke, or suspend the certified operator's certification will become final.
4. Certified operator must include the following information in their appeal:
 - a. A copy of the decision they are appealing; and
 - b. A statement of their reasons for believing that the decision was not proper or did not follow the required standards
5. If no appeal has been received by the Qmark International Certifications Pvt. Ltd .against the notice of suspension or withdrawal, or if in the opinion of the Qmark International Certifications Pvt. Ltd . the explanations submitted are not satisfactory, Qmark International Certifications Pvt. Ltd . will, on the expiry of the notice, suspend or withdraw the certification and inform the certificated operator in writing.
6. Qmark International Certifications Pvt. Ltd . will be responsible for all decisions at all levels of the appeals handling process.
7. Submission, investigation and decision on appeals will not result in any discriminatory actions against the appellant.
8. The appeals handling process includes the following elements and methods:
 - An outline of the process for receiving, validating and investigating the appeal, and for deciding what actions are to be taken in response to it, taking into account the results of previous similar appeals;
 - Tracking and recording appeals, including actions undertaken to resolve them;
 - Ensuring that any appropriate correction and corrective action are taken.
 - Qmark International Certifications Pvt. Ltd . will acknowledge receipt of the appeals and will provide the appellant with progress reports and the outcome.
 - The decision to be communicated to the appellant will be made by or reviewed and approved by individual(s) not previously involved in the subject of the appeals.
 - Qmark International Certifications Pvt. Ltd . will give formal notice to be appellant of the end of the appeals handling



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9. If during investigation it is found that there is some gap in Qmark International Certifications Pvt. Ltd . system while decision making regarding operator's Organic management system then an appropriate & timely correction & corrective action will be taken & it will be ensured for its appropriateness by Executive Quality Assurance or a person appointed by it.
10. National Organic Program, Adverse Action Appeal Process-Certified Operation or Applicant for Certification will be referred for guidance.

OP-10 Internal Audit

Purpose: The purpose of this document is to lay down a procedure to check the efficiency and compliance of Qmark International Certifications Pvt. Ltd . system as per NPOP & PGS.

Scope: It covers the verification entire management system and certification cycle from receiving application to granting and maintaining certification.

Responsibility: Quality Assurance Department (primary), Chief Executive Officer (primary), Internal Auditor

Procedure:

1. Prepare an audit plan:
 - a. An audit is plan at least once every 12 month in which all activities should be covered
 - b. Plan the duration (month & date) of audit during which the audit will take place.
2. Select internal auditors:

If needed, Chief Executive Officer will appoint a team comprised of following characteristics:

 - a. Internal audits are conducted by qualified personnel knowledgeable in certification, auditing and the requirements of Organic Certification System according to NPOP & PGS,
 - b. To avoid any COI, inter departmental auditors can cross audit the other departments i.e. audit will be scheduled in such a way that any auditor will not audit work conducted by themselves. The audit team & audit schedule will be verified by QA Executive before approval.
 - c. Auditors must sign the forms OC_003 Conflict of Interest Annual Declaration
3. Prepare & approve an audit schedule:
 - a. Plan audit dates, scope etc
 - b. Plan the schedule including the process and areas to be audited.
4. Checklist used:
 - a. Internal Audit Checklist
 - b. Internal ISO Guide 65 Audit Checklist



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- c. NOP English Audit checklist
- d. IA checklist- Quality Manual

5. Audit Methodology:

a. Audit Opening Meeting:

In opening meeting Chief Executive Officer & QM Executive/Internal auditors will inform the auditee about audit scope and will discuss the audit plan with them.

b. Areas to be covered: Documents, Manuals, Policies, files & record

c. Documents (Quality Manual, Procedure Manual, Job Description Manual and other relevant records):

- Any changes in the documents
- Any addition of documents
- Policies of Qmark International Certifications Pvt. Ltd .
- Other relevant changes (if any)

d. Records:

- Training records: training certificates etc.
- Operator's file (file review checklist): at least 20% (in number) files of the total cases will be audited.
- Auditor & Reviewer Appointment form:
- Qmark International Certifications Pvt. Ltd . Internal Audit, Non-conformance and other internal records
- Others (as per List of records)

e. Witness Audit: it will be conducted by a inspector of Qmark International Certifications Pvt. Ltd . along with, but other than, the inspector previously involved in that case.

f. Audit of account wherever relevant to scope of audit

g. Other points to determine the adequacy of the certification system for organic with respect to the PGS.

h. Points to determine the effectiveness of the various procedures in meeting Organic Certification (PGS) system objectives.

i. Documents modifications since last audit (to determine effectiveness)

6. Points to remember:

- a. Findings recorded by auditor must be supported with objective evidence, reference document and participating Auditee names on checklist.
- b. Always have a copy of standard against which the audit is to be conducted
- c. Non-conformities are recorded on NC form and Auditee agreement is obtained.
 - NCs which indicate significant inadequacy of a procedure or inadequate implementation of a procedure will classify as major.
 - NCs of insignificant or isolated lapse/need to be further investigated will be treated as minor.



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7. Corrective/Preventive Action

Following things are done by the auditee and verified by the internal auditor:

- Auditee records proposed corrective/preventive action on NCR and expected date of completion.
- Auditee carries out corrective/preventive action prior to specified dates

8. Audit Report:

The audit report is made by auditor which includes the following as minimum:

a. Audit plan and summary as an evidence of:

- Audit was planned
- Audit covered all quality related activities in the organization
- Peer appraisal summary sheet were referenced.
- Auditors were independent of activity audited
- Audit Checklist as an evidence of what all was audited and observed.
- Detected findings & non-conformities.
- Corrective action was planned and executed.
- Corrective action taken was found to be effective.



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OP-11

Management Review

Purpose: To establish and maintain the system of conducting regular reviews of the Qmark International Certifications Pvt. Ltd . Management System, to ensure, its continuing suitability, adequacy and effectiveness.

Scope: To assess the effectiveness of certification system and other Management Services including assessment of opportunities for improvement & Changes in Quality Policy and Quality Objective.

Responsibility: Chief Executive Officer, Quality Manager, Inspectors, Reviewers, Administration Department

Procedure:

1. Frequency: The Management Review meetings will be held at least once in a year.

Note: Although regular weekly and monthly minutes of meetings are carried out by Qmark International Certifications Pvt. Ltd . but MRM will cover review of entire management once in a year cycle.

2. The composition of the Management Committee for undertaking reviews is as under; (as required):

- Chief Executive Officer
- Quality Manager
- Reviewers
- Inspectors
- Organic Expert as External Member

3. Review inputs

The input to the management review will include information related to

- a. Results of internal and external audits,
- b. Feedback from certified operators and interested parties related to the fulfillment of this International Standards
- c. The status of preventive and corrective actions,
- d. Follow up actions from previous management reviews,
- e. The fulfillment of objectives,
- f. Changes that could affect the management system,
- g. Appeals and complaints and
- h. Resource requirements.



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4. The inputs may be provided by the:

Chief Executive Officer:

- Preview meeting customer feedback including complaints
- Issues related to changes in Quality Policy and Objectives.
- Anticipated operational changes.
- Training needs
- Competence related activities

Quality Manager:

- Customer complaints / feedbacks.
- Previous Internal Quality Audit reports/ results.
- Effectiveness of Quality Management System & improvement if any.
- Corrective and Preventive actions / status.

Inspectors & Reviewers:

- All interfaces including technical

Executive Administration:

- Resource requirements

5. Review outputs

The outputs from the management review will include decisions and actions related to

- a. Improvement of the effectiveness of the management system and its processes,
- b. Improvement of the certification services related to the fulfillment of this International Standard, and
- c. Resources needs.

6. The detailed observations, conclusions and recommendation are recorded in the record for 'Management review Meeting'

7. After this review, the Chief Executive Officer ensures that:

- Personnel responsible for the area audited are informed of the outcome of the audit;
- Corrective action is taken in a timely and appropriate manner; and
- The results of the audit are documented.



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OP-12

Corrective & Preventive Action

Purpose: To establish and maintain an effective procedure, for taking appropriate corrective action and to eliminate the cause of nonconformities in order to prevent re-occurrence of non-conformity.

Scope: This quality system procedure applies to all corrective actions taken by Qmark International Certifications Pvt. Ltd . to avoid reoccurrence of detected non-conformities

Responsibility: Chief Executive Officer, QM & relevant staff

Procedure:

Corrective action:

1. Corrective action request is initiated for significant instances of a non-conformance during audits, review, file management, Quality Assurance actions, Management Review, Internal audits etc.
2. Corrective action request is initiated for significant instance of Customer Complaint.
3. A close watch is kept on all non-conformities. In particular, attention is paid to the following:
 - Complaints from operators.
 - Complaints from operator's customers
 - Study of processes and audits with reference to any trends, which indicate non-conformity.
 - Suggestions and observation from employees. Where a corrective action seems possible or is considered desirable. Preventive action request is initiated.
4. Actions are proposed and executed to remove non-conformities and are recorded. Nonconformities reported and ascertained from customer complaints are reviewed. Causes on non-conformities are traced from the relevant records.
5. Action plan is prepared for eliminating the causes for occurrence of non-conformities & implement action plan.
6. Effectiveness of these actions is evaluated during internal quality audits and discussed in management review meetings.

Preventive action:

Preventive action can be initiated at any time; here after the person identifying the need of preventive action will be called as assessor.

1. Potential nonconformities and their causes are identified through outcomes of audits, review, file management, QA actions, Management Review, Internal audits etc., internal & external communications (IA, MRM and communication with accreditation body, applicant/ certified operators, consumers of certified operators etc.)
2. Then the need for action to prevent the occurrence of nonconformities is evaluated (this can be done through risk analysis),
3. after that the appropriate & effective actions needed are determined and implemented to prevent occurrence of the nonconformity,



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4. Records of the results of actions taken are maintained, and
5. Effectiveness of these actions is evaluated during internal audits and discussed in management review meetings.





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OP-13

Procedure for PGS Portal operations:

Purpose: To provide details on the processes to be completed under PGS Portal.

Scope: Documentation of certification processes through PGS Portal as per directives of NCOF.

Responsibility: Inspectors, Reviewers & Executives

Procedure:

Following Certification activities will be done through PGS portal:

1. Registration
2. Date entry of farmers
3. Internal audit report of farmers
4. Peer appraisal of Local groups
5. Training & Meetings entry
6. Expected/Actual Yield
7. Residue/Soil test reports
8. Certificate generation
9. TC Generation

Qmark International Certifications Pvt. Ltd . will follow all the procedure as per PGS portal and as advised by NCOF time to time.

References: www.pgsindia.gov.in



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Annex 1

Fees and other charges for certification

- The current Qmark International Certifications Pvt. Ltd . *Fee Schedule* on the format prescribed under PKVY guidelines however, Fee schedule for PGS certification will be available at companies website and is provided to each new applicant and to each certified operation prior to their annual renewal. The fee schedule is also published on the Qmark International Certifications Pvt. Ltd . web site.



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Annex 2 Mediation

Qmark International Certifications Pvt. Ltd . will not offer mediation. Qmark International Certifications Pvt. Ltd . Chief Executive Officer will work with operators to be sure that they have ample opportunity to address any issues identified in a notice of noncompliance.



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Annex 3

Findings of Inspection

Inspection findings are based on the objective evidences.

Classification of Inspection findings

Qmark International Certifications Pvt. Ltd . has divided the inspection findings as follows:

1. Conformity with inspection criteria
2. Minor N.C.:
 - Nonconformance to that judgment and experience indicate is not likely to result in the failure of the organic integrity or not affecting the organic integrity;
 - A failure in some part of the operator's documented system, or
 - A single observed lapse in following one item of the company's management system

Action required:

This category of findings requires Qmark International Certifications Pvt. Ltd . to issue a formal NCR; to receive and approve operator's proposed correction and corrective action plans; and formally verify the effective implementation of planned corrections and corrective action. A documentary proof of closing the minor N.C. is required within a defined time period. A failure to close out Minor NCR within the time limits may lead to a Major NC.

3. Major Non-conformity:
 - Based on objective evidence, the absence of, or a significant failure to implement and/or maintain requirements of the applicable standard. Such issues may raise significant doubt as to the capability of the management system to achieve its intended outputs.
 - A number of minor nonconformities (more than 4) against one requirement can represent a total breakdown of the system and thus be considered a major nonconformity
 - If the Minor N.C. occurs repeatedly for more than two times then it will also falls in the category of major N.C.
 - A condition that may result in the **failure or materially reduce the usability** of the products for their **intended purpose**.
 - Any noncompliance that would results in non conforming product i.e. that can directly affect to the organic integrity
 - **Action required:** This category of findings requires Qmark International Certifications Pvt. Ltd . to issue a formal NCR; to receive and approve operator's proposed correction and corrective action plans; and formally verify the effective implementation of planned corrections and corrective action. Correction and corrective action plan should be submitted to Qmark International Certifications Pvt. Ltd . prior to commencement of



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follow-up activities as required. Follow-up action by Qmark International Certifications Pvt. Ltd . must 'close out' the Major NCR before issuing certificate. Decision on certification will be taken only after closing Major Non-compliances. If significant risk issues to Organic integrity are detected during an inspection these shall be reported immediately to the operator and more immediate or instant correction shall be requested. If this is not agreed and cannot be resolved to the satisfaction of Qmark International Certifications Pvt. Ltd ., immediate suspension shall be recommended.

Notes:

- The time limit for closure of N.C. is defined as per the severity of N.C, on a mutual agreement of Qmark International Certifications Pvt. Ltd . reviewer or inspection & operator.
4. Observation:
- This is an area of the system for which the operator is required to investigate potential non-conformity.
 - Action required: Qmark International Certifications Pvt. Ltd . may require operator to formulate preventive action plan for approval prior to next planned inspection / certification decision or alternatively may follow up operator's preventive action at the next planned inspection. Lack of operator's attention to such issues implies that a preventive action system is not working effectively.
5. Opportunity for improvement:
- A documented statement, which may identify areas for improvement however shall not make specific recommendation(s).
 - Action required: Operator may develop and implement solutions in order to add value to operations and management systems. Qmark International Certifications Pvt. Ltd . is not required to follow-up on this category of inspection finding.

The inspection team meets wherever needed to review the inspection findings at appropriate stages during the inspection.



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Annex 4

Qmark International Certifications Pvt. Ltd . Certification Procedure

Step of PGS Organic Certification

Step 1

Registration of LG

Step 2

Initial Review of Application

Step 3

On site Inspection

Step 4

Secondary Review & Decision

Step 5

Acceptance & activation under PGS portal



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Annex 5

Organizational Structure (Flow Chart)

Organizational Chart





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