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4. INSPECTION / AUDIT / EVALUATION

Meghalaya State Organic Certification Body has developed and documented complete set of procedures for inspections / assessment and evaluation of the certified operators for assessing the compliance requirements of NPOP.

There are 3 stages in carrying out inspection – Pre-Inspection activities, Onsite Inspection and Post Inspection Activities.

4.1. Scope and responsibilities involved:

- This procedure applies to all the projects, operations, products under certification.
- Evaluator is responsible for issuance of inspection assignment for the projects.
- Evaluator is responsible for planning and scheduling the inspection in a timely manner.
- Inspector is responsible for sharing the inspection plan with the operator, execution of the inspection, report writing and submission of the inspection report and its associated documents to evaluation and certification department.

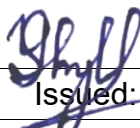
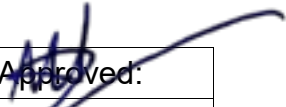
4.2. Common Procedures:

- Meghalaya State Organic Certification Body has developed and documented a detailed procedure on inspection.
- Inspection / Audit of organic projects can be initial inspection when operator is being certified for the first time or annual inspection which mandates at least one onsite inspection per operator per year.
- There are three phases of assessing the compliance requirements of applied entity for applicable NPOP standards, viz. pre-inspection activities, actual onsite inspection and post-inspection activities are associated with the inspection.
- Pre-inspection activities are the generally the preparation for the inspection.
- The Evaluator selects the inspector based on the inspection requirement and competence required to perform the task. The same inspector shall not visit the same operator more than two years in a row.
- The same is communicated to the Evaluator for creating the inspection assignment.

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- After receipt of the inspection assignment a docket of operator's available documents (reviewed application form and organic management plan, previous inspection report, certification decision, previous non-Conformities, records of complaint if any), sampling kit, inspection templates, Approved Farmers List, TraceNet risk assessment list and other associated records are issued to the inspector.
- The inspector studies the application form and associated documents, previous inspection report and notice of non-compliance report.
- Inspector carries the operator's available documents along with the inspection tools such as sampling kit, templates, checklists, standard copies and other to the inspection.
- At the beginning of the inspection the inspector must check, and counter sign the OMP whether the statement made by the operator in the application and Organic Management Plan is really reflecting the encountered situations at the operation. In case of discrepancies the inspector must report the observed discrepancies and non-conformities to the evaluator in turn evaluator will write to the operator for his/her clarifications.
- Actual inspection is carried out on-site by the inspector, which may comprise but not restricted to the following,
- After the physical inspection is completed, the post inspection activities start.
- An exit interview report which states the information viz. details of visit, persons interviewed, documents verified, areas/ activities/ operations visited, and non-conformities observed, are filled up by the inspector on site and the same are signed by the operator and the inspector.
- An exit interview is conducted; one copy of the exit interview is given to the operator and the other copy will be attached to the inspection report. Inspection report is submitted to the Evaluator within 7 working days from the date of the inspection for further process.
- The responsibility to file all these documents in the concerned operators file lies with documentation assistant. The Evaluator will monitor the filing of documents in the operator's file by the assistant.
- Operator can be further audited during the year for additional inspections and must be audited at least once a year as part of the annual surveillance.
- The inspections will be conducted when the land, facilities and activities are capable of demonstrating compliance or having capacity to comply at the time.

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4.3. Inspection and Evaluation

The above procedure is given in detail below:

A qualified, competent, experienced, and well-trained inspector will be assigned to conduct the onsite inspection of all the activities and operations in the scope of certification requested by the applicant to check and verify the compliance of the operator to NPOP requirements. A well-defined and scheduled audit plan will be shared with the operator before the actual physical inspection of the farms /production for all announced inspections. When inspection is done for the new applicants for the first time, it is called Initial Inspection. Thereafter Renewal or Annual or surveillance inspections are carried out for certified units at least once in a year.

4.4. Detailed Inspection procedures

Once the completed application, updated Organic Management Plan and signed contract etc. received from the operator, approved by the evaluator and formal contract is also signed by the CB, TraceNet operator will register the project in TraceNet and will send the user ID and password to the registered mobile number of the operator. Operator will then complete the TraceNet entries according to the type of the project. Once TraceNet entry is completed with all details, operator will forward the TraceNet data for review by the certification body.

The Meghalaya State Organic Certification Body inspector will have the right to visit all relevant facilities both organic and non-organic, including verification of accounts and other documents of the operator whenever deemed necessary and required as per the risk category of the operator and NPOP standard requirements.

Meghalaya State Organic Certification Body will instruct the inspector to check the compliance of the operator against the standards inspected. Inspections will be carried out in the presence of an authorized person/staff. Any special inspection requirements of MSOCB or from the competent authority will be conveyed to the inspector well in advance.

Inspection system for potential use of GM products:

Sampling should be done from plants randomly distributed throughout the crop. A 'W' walk through the crop would provide a suitable spread of sampling throughout the crop. For actively growing plants one leaf should be removed from near the top of the plant and placed in a clean, new plastic bag, using disposable gloves. (The detailed sampling method has been given in 4.20.10.6 of this operating manual).

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4.5. Assignment and Scheduling of Inspections

The Quality manager identifies the availability of the most qualified and competent inspector for the project and allots the inspection work based on the inspector's area of expertise. It has to be checked that he does not have any conflict of interest in dealing with this particular project. The same inspector shall not be allowed to inspect the same operator more than two years in a row. The operator shall neither have the right to choose/ suggest the inspector for the inspection. Prior to the inspection, the organization informs the operator, the details like, date, time and the name of the inspector who will visit the farm and the operator has the opportunity to inform the Certification body of any potential conflict of interest with the inspector named, (except for unannounced inspections).

Grounds for objection to inspection by the operator: The operator shall have neither the right to choose nor to recommend inspectors. The operators shall have the right to be informed about the identity of the inspector before the inspection visit, and to raise objections related to any potential conflict of interest. Meghalaya State Organic Certification Body will send an alternate inspector after reviewing the fact.

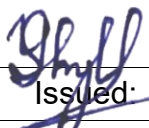
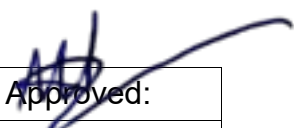
In case the operator wants to change the inspection and certification agency, they shall inform MSOCB stating the reason for their decision and seek No Objection Certificate.

4.6. Information to the Registered Operators Under NPOP

Meghalaya State Organic Certification Body shall review and update the policy and procedures from time to time to protect and safeguard the core competency of the organization as well as enhancing the general awareness of the operators about changes in its certification requirements.

Whenever Meghalaya State Organic Certification Body plans to make changes in the certification requirements on its own or as per the regulator's advisory notes, such changes will be intimated to the operator prior to the date of implementation of certification requirements to get the feedback or to gather additional inputs from the registered operators.

Meghalaya State Organic Certification Body will adopt a common policy to circulate and update the operators in advance about the occasional changes in the certification requirements either by the Meghalaya State Organic Certification Body or by the APEDA through advisory notes for their feedback or to update them about the changes in the certification requirements. By this way, operators can adopt such changes in certification requirements from the date of informing them and they can have not more than 6 months for implementation.

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The Meghalaya State Organic Certification Body keeps regular communication with its operators about changes made to the standard regulations and policy matters and also during any changes planned, reviewed and implemented within the organization.

The operators are required to complete the payment of all the fees before they are included in the certification process.

The operators are required to keep a signed and valid copy of the contract always.

4.7. Verification of Changes to Operations

The Meghalaya State Organic Certification Body Staff shall ensure operators are aware of the changes made to the MSOCB certification program. This shall be in a reasonable period, generally not shorter than six month and no longer than one year.

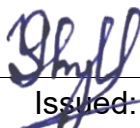
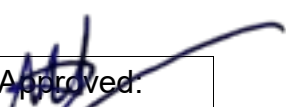
The Meghalaya State Organic Certification Body staff shall verify (during the next scheduled inspection) that operators make/made the necessary action to their management systems. The QM shall be responsible to ensure this verification is accomplished. The Certification Committee will allow a reasonable period for implementation of such changes.

4.8. Basic Structure of Certification Agreement

Certification agreement is an Agreement to agree to follow and implementation of standards terms and conditions to undertake quality certification process and to avoid future consequences to implement the certification standards.

Referred Documents:

- Certification Contract between CB and Operator
- Template for Subcontracting
- Agreement with staff

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4.9.1 Prior to Inspection

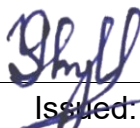
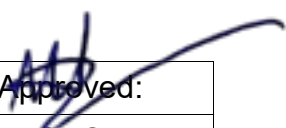
To ensure a smooth inspection process, the inspector shall study the application submitted by the operator along with farm documents, past inspection reports, if any, and any previous comments of the certification committee. The inspector may carry the operator's file including the signed application submitted, any other forms or documents submitted by the operator, copy of the counter signed contract with the operator if applicable (to be given to the operator), copy of the relevant organic standards to be inspected, sufficient copies of the inspection reports, carbon papers, calculators, pens, camera, GPS unit and sample collection containers besides other relevant articles like notepad and magnifying glass etc.

Operator files shall be kept up to date and shall include history, earlier inspection findings, a description of activities/processes, maps/plans, product specifications, used inputs, earlier irregularities, infringements, conditions, disciplinary measures, and label approvals.

Instructions for inspection visit: Sufficient information shall be made available to the inspectors about the operator to allow proper preparation by the inspector. This includes, among others, earlier inspection findings, a description of activities/processes, maps/plans, product specifications, and used inputs, earlier irregularities, infringements, conditions and disciplinary measures. The visit and the questionnaires used during the inspection, and the reports emanating from the inspection, shall be comprehensive, covering all relevant aspects of the production standards and shall adequately validate the information provided. Inspectors and Certification Bodies shall have access to any non-organic production unit, or units associated by ownership or management. Inspection, including document review, should include such units when there is sufficient reason for doing so, such as production of the same kind of products etc. Inspection reports and inspection shall, as far as possible, follow a specified protocol to facilitate a non-discriminatory and objective inspection procedure. Inspection reports shall give adequate information on what was actually checked, including, but not restricted to date and time of inspection, persons interviewed, Inspectors observations crops/products requested for certification, fields and facilities visited, documents reviewed.

4.9.2. During the Inspection

An initial on-site inspection/audit will be conducted of each production unit, facility, and site that produces or handles organic products and that is included in an operation for which certification is requested.

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All applicants shall be subject to inspection/evaluation activities including but not limited to:

- A. An opening meeting introducing the inspection plan in an organized manner;
- B. Documentation review {risk assessment, policies and procedures, records (input/output reconciliation, trace-back audits), etc.};
- C. Interviews with responsible persons and witness audits;
- D. Sampling for analysis if required in accordance with the sampling policy set forth in the applicable standards and this certification manual;
- E. Inspection of organic and non-organic units where there is reason for doing so, which may include, conventional and transitional crop areas, harvest storage locations, preparation areas, processing and conditioning sites, administrative areas and records;
- F. Filling the Checklists and Report writing
- G. Exit Interview and Closing meeting.

As a summary –

- Opening Meeting- Scope of audit and interview with the operator and / or personnel in-charge (with respect to the application form).
- Verification of the implementation of practices and procedures as stated in the application and organic management plan submitted by the operator.
- Familiarization of site (with respect to maps/ actual visit.).
- Observing activities to assess the extent of conformity to the requirements of NPOP.
- Verification of activities of the operator.
- Recording the observations.
- Verification of records maintained by the operator.
- Collection of samples as asked in the assignment or on risk basis.
- Exit Interview (Noncompliance to be communicated with the operator).

4.9.3. Exit Interview

During the closing meeting; the applicant will receive an Exit interview Summary which includes unofficial findings which signed by the inspector and the operator. The inspector/auditor will be able to clarify and answer any questions pertaining to the individual findings but will not be able to consult on how to make corrections for the identified deviations from the compliances.

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