Section 3

Annexure 3C

QUALITY COUNCIL OF INDIA

India Good Agricultural Practices (IndG.A.P.) Certification Scheme

Certification Criteria – Seed to Sale (S2S) Rules

Section 3 Annexure 3C
SEED TO SALE (S2S) RULES

1. Introduction

1.1. This document describes additional certification rules, guidance for implementation for any party seeking certification for any crop listed in accordance with the IndG.A.P. Standard, applicable to any module w.r.t Indian acts, regulations, code of practices, best industry practices, this mainly follows the values chain approach means getting seed till making produce ready for sale to customer.

1.2. These Crop Rules – Seed to Sale (S2S) shall be used in combination with the IndG.A.P. General Regulation sections 2 to 6 that define the certification rules that apply for IndG.A.P. Standard.

1.3. The term “shall” be used throughout this document to indicate those provisions which, reflecting the requirements of IndG.A.P., are mandatory.

1.4. S2S Rules are placed in this document as per follows:

1.4.1. Seed and Planting material Procurement related rules

1.4.2. Cultivation aspect, PNP & PPP Application till PHI related rules

1.4.3. Harvest related rules

1.4.4. Produce Handling including on farm processing related rules

1.4.5. Sales & Trading including Traceability related rules

2. Seed and Planting material Procurement related rules

2.1. Certification Scope

2.1.1. Crop Rules

2.1.1.1. Crop Sub Scopes: Crops Rules apply for all sub-scopes under the Crops scope, Spices, Combinable crops, plantation crops like Coffee, Tea, Flowers, and Ornamentals (not for human consumption), if the farmer have some crops of medicinal usage as per VCS MPP or used for formulations for the AYUSH sector, they also can be cultivated under IndG.A.P. systems. The inspection can be planned at same time (integrated audit) if CB and Inspector are competent.

a. Fruit and Vegetables: IndG.A.P. certification covers fruit and vegetables used for fresh, cooked, or processed consumption by humans. Crops (vegetables or herbs) grown solely for medicinal or aromatic purposes cannot be certified as of now.

b. Plant Propagation Material: Products certified under PPM sub-scope are not intended for human consumption or for feed but used as planting materials for other modules of IndG.A.P. systems and are at different location other than site, not in control of producer.

c. Combinable Crops: covers extensive crops for cooked or processed consumption by humans or animals or for use in the industry e.g. cereals, pulses.

d. Herbs: Products classified as herbs in general are listed in the 'IndG.A.P. Product List' as individual products with separate identification numbers.

i. However, where more than one herb product is grown, residue testing does not have to be performed on each individual product (herb), but according to the risk of the group of herbs.
ii. Also, the use of plant protection products on herbs is applicable to herbs as a group and not for each individual product (herb).

e. Crop List: Crops that can be certified as per IndG.A.P. System.
i. SCOPE:
- Criteria for inclusion into this list of a product are by necessity arbitrary, based on IndG.A.P. Secretariat decision.
- IndG.A.P. certification cannot be achieved for “wild crops” such as mushroom, walnut, litchi, etc. that are not cultivated.
- Crops certified as IndG.A.P. cover the entire crop grown by the producer / producer group. This crop can be cultivated in open fields & or under cover / protected cultivations like poly tunnels, shade nets, green houses, with or without soil, hydroponic or aquaponics (Additional risk assessment necessary for food safety issues)

ii. Sub-scope: Fruits and Vegetables
- Fruit and Vegetables for the purpose of IndG.A.P. certification is defined in the list below. The range of products can be defined as: products originating from plants which are commonly designated as producing either “fruit”, “vegetables”, “edible roots”, “bulbs”, “tubers”, “nuts”, “spices” or “herbs” (1), for fresh, cooked or processed consumption by humans.
- Herbs includes Aniseed, Balm, Basil, Borage, Caraway, Catnip, Chamomile, Chervil, Chicory, Chives, Coriander, Dill, Fennel, Laurel, Lavender, Lemon grass, Lovage, Marjoram, Mizuna, Nettle, Oregano, Parsley, Peppermint, Rocket, Rosemary, Sage, Savory, Sorrel, Spearmint, Tarragon, Thyme
- It does not include medicinal herbs or herbs used solely for their aromatic purposes.

iii. Sub-scope: Combinable Crops
- Combinable Crops for the purpose of IndG.A.P. certification are defined in the list below.
- The range of products can be defined as: products originating from extensive production systems, whose are commonly designated as producing either “grain”, “pulses”, “fodder” or “extracts” (oil, sugar, starch, etc.), for cooked or processed consumption by humans or animals, or for use in industry. Other descriptions for this type of product are “Broad-acre Crops”, “Bulk Crops” or “Arable Crops”.

iv. Sub-scope: Coffee (green) - Green Coffee Beans
v. Sub-scope: Tea - Tea (Camellia sinensis)
vi. Sub-scope: Spices - The crops which are listed by Spice Board and traded as spices are included as spices, however for easy understanding if the product is used in fresh form after harvest for immediate consumption by end consumer, then MRL of that form and F&V Module will be applicable
vii. Regarding addition of new products: This list is not exhaustive and new products can be added on request to and after approval by IndG.A.P. with the following information: Product name, Scientific name and any

additional information that can assist to make the decision whether or not to accept the product eg: as presented in below table:

Product Name	Scientific Name	Parts of the plant use in Trade		
		F & V	Combinable Crop	Spices
Banana	Musa Acuminata	Fruit		
Grapes Table	Vitis Vinifera	Fruit		
Potato	Solanum Tuberosum	Tuber		
Onion	Allium Spp.	Tuber		
Orange	Citrus Sinensis	Fruit		
Turmeric	Curcuma Longa	Tuber		Dried Tuber
Capsicum/Peppers/ Chillies	Genus Capsicum	Fruit		
Black Pepper	Piper Nigrum	Fruit		Dried Fruit
Cumin	Cuminum cymium		Fresh Fruit	Dried Fruit
Pomegranate	Punica Granatum	Fruit		

viii. Legal requirements: Rules related to compliance of seed act / Protection of Plant Variety and Farmers Rights Act (PPVFRA) / UPOV convention requirements shall be mandated as applicable.

ix. If the seeds / planting material intended is registered under any of the requirements that shall comply with relevant requirements from supplier to producer with applicable records.

f. Modular structure of Crops standards

i. The Crops Standards are composed of scope and sub-scope modules. The evaluation of compliance with the Standard implies the verification of applicable modules. It is not possible to certify the respective sub-scope without also verifying compliance with the applicable scope. The compliance criteria of the scope shall be interpreted according to the inspected sub-scope.

ii. For instance, Apples shall be certified under the Fruit and Vegetables module, which automatically requires compliance with the All-Farm Base and Crops Base modules.
iii. The certification of Plant Propagation Material requires compliance with the All-Farm Base, Crops Base, and Plant Propagation Material modules.
iv. Further information on the structure and modular approach is mentioned in the 'IndG.A.P. Section 2 – General Requirements'.

2.1.2. Only products that are produced by producers themselves. Producers cannot receive certification for the production of products that are not produced by themselves.

3. Cultivation aspect, PNP & PPP Application till PHI related rules

3.1.1. Conditions of Registration of Agrochemicals

3.1.1.1. FSSAI is responsible for issues relating to food safety and trade. CIBRC regulates the use of agrochemicals under the insecticides act, 1968 executed by CIB&RC whereas FSSAI sets maximum residue limits (MRLs) under the food safety & standards act, 2006. CIB&RC place conditions on agrochemicals when they are first registered.

3.1.1.2. There are specific conditions for use of agrochemicals:

a. This condition means the product must only be used according to the label directions (i.e., no off-label use is allowed). In this case all label directions (including pests targeted) are mandatory
b. This condition places the obligation on the user to ensure that residues in the crop do not exceed the set or default MRL.
c. The product must only be used according to the label directions (i.e. off label use is not allowed) and all label directions (including pests targeted) are mandatory. Where permission has been granted, use of the product must comply with any additional controls stated in the documentation confirming permission. Section 3 outlines how to determine what conditions are in place for each agrichemical.
d. It is important to note that in general, the use of agricultural compounds on animals is prohibited. This is ensured by making registration mandatory for any alternate use.

3.1.2. Maximum Residue Limit (MRL)

3.1.2.1. In India, the main purpose of setting a MRL is to ensure that the best methods of crop production – known as Good Agricultural Practice (GAP) – are being used to keep residues in food as low as possible. When registering a compound, registrants must provide information on the least amount of that compound required to control the pest / disease and measure the residue that results from that use (if any). The MRL is then set at that level so that if residues exceed this level, it indicates GAP and label directions have not been followed.

3.1.2.2. The Food Act requires that all crops produced in India comply with the MRL Food Notice and it is illegal to sell food with residues above the India MRL (or

default MRL if none is set). MRLs are one tool used to monitor if GAP is being followed during food production.

3.1.2.3. MRLs are outlined in the regulation Food Safety and Standards (Contaminants, Toxins and Residues) Regulations, 2011 and amendments thereunder. 5% of the MRL Value is applicable for organic food under Food Safety and Standards (Organic Foods) Regulations, 2017 for specific crops or crop groups and compounds. The India MRL regulation is regularly updated and can be accessed on the FSSAI website: https://www.fssai.gov.in/cms/product-standards.php

3.1.2.4. Where a specific MRL is not set, the default MRL, as prescribed by FSSAI applies. The Government of India's Food Safety and Standards Authority published a clarification to the Food Safety and Standards (Contaminants, Toxins and Residues) Regulations, 2011, that all agricultural food products and associated processed food categories that do not have fixed insecticide maximum residue levels will have a default limit of 0.01 mg/kg. The clarification notes that the default limit does not apply to thermally and chemically processed foods (https://www.fas.usda.gov/data/india-fssai-clarifies-food-product-categories-qualify-default-insecticide-tolerance-limits#:~:text=The%20Government%20of%20India%27s%20Food,maximum%20residue%20levels%20will%20have).

3.1.2.5. Growers must undertake a risk assessment, before the agrichemical is applied, to determine the time between the application and harvest to be sure they will not exceed the MRL at harvest (either set or default). Section 6 outlines how to determine this.

3.1.2.6. Compliance with the MRL regulation is important for a range of reasons, not only to comply with India law, but also to ensure access to certain markets. Overseas MRLs for exported produce may be different (i.e., higher, or lower or no MRL at all) to those set in India. However, in all cases produce grown for export markets must first meet India requirements, even where the India MRL is lower than what may be set overseas.

3.1.2.7. Unless exporter have Exporter manufacturing category specifically mentioned in his License issued by FSSAI under FSSA 2006, in such cases non-confirming products cannot be sold in India, in such cases, it is necessary for producer to declare on record that the crop Is cultivated only for export market and not for India market.

3.1.3. Controls on PPP substances

3.1.3.1. Central Insecticides Board, under the Insecticide Rules of 1971

a. advises the Central Government on the manufacture of insecticides under the Industries (Development and Regulation) Act, 1951 (65 of 1951);
b. specify the uses of the classification of insecticides on the basis of their toxicity as well as their being suitable for aerial application;
c. advise tolerance limits for insecticides, residues and an establishment of minimum intervals between the application of insecticides and harvest in respect of various commodities;
d. specify the shelf-life of insecticides;

e. suggest colourisation, including colouring matter which may be mixed with concentrates of insecticides, particularly those of highly toxic nature;
f. carry out such other functions as are supplemental, incidental or consequential to any of the functions conferred by the Act or these rules.

3.1.3.2. The Insecticide Act, 1968 places controls on agrochemicals to manage risks to people and the environment. This act places both generic and specific controls on some agrichemicals that can mean off label use is not allowed. These controls are often unique to the trade name/ active ingredient of the product and should be checked before the use of any agrochemicals, to ensure all controls are complied with.

3.1.3.3. CIBRC controls can restrict how a product can be applied by placing limits on the use pattern. CIBRC may specify controls such as:
a. maximum rates, intervals and number of applications
b. the type of application equipment that can be used
c. buffer zone distances
d. For some newer and recently reassessed products, controls that impose a minimum re-entry interval are set by CIBRC. These and additional information can be accessed here: http://ppqs.gov.in/divisions/integrated-pest-management/instruction-safe-use-pesticide.

3.1.4. **Other requirements**

3.1.4.1. The label should be read fully even when using agrochemicals to ensure compliance with other directions such as transport, PPE, handling, storage, spray drift, buffer zones, bee safety, tracking and record keeping instructions. This guideline does not detail these other requirements. For further details on these requirements please visit http://ppqs.gov.in/divisions/integrated-pest-management/instruction-safe-use-pesticide (Instruction for Safe Use of Pesticide).

3.2. **Residue Management System (RMS) / Residue Management Plan (RMP)**

3.2.1. **Residue Management System (RMS)**

In the IndG.A.P. scheme, the scheme requires the producers to be a part of RMS or as RMP mandatorily. The said document details the requirements of RMP is being mandated by APEDA, the apex agro export promotion body of the Government of India. The details of the same are available in the APEDA website (https://apeda.gov.in/apedawebsite/Grapenet/Hortinet.htm).

Mandatory minimum criteria of a Residue Monitoring System (RMS) is as under.

3.2.1.1. Background
a. In the framework of IndG.A.P. control point and compliance criterion and based on the outcome of the risk assessment, residue analysis or participation in a second- or third-party plant protection product residue monitoring system is required.
b. In order to ensure a harmonized interpretation and level of consistency across the residue monitoring systems used by producers, the following have

been established as the minimum requirements that all residue monitoring systems shall comply with in order to be considered compliant with the IndG.A.P. requirements.

c. Having these criteria defined also makes it possible to reduce the need for multiple assessments of one and the same residue monitoring system, which may be servicing several IndG.A.P. producers

3.2.1.2. Definition of first-, second- and third-party sampling:

a. First-party sampling: When the producer (Option 1) or a producer group member (Option 2 member) takes the product sample from its own production. For certification, the first-party sampling (self-sampling) is acceptable, but an RMS cannot be based on first-party sampling.
b. Second-party sampling body: The sampling organization is a 2nd party sampling body when it is a separate, but identifiable part of an organization that is involved in production, supply, purchase and/or or ownership of the products sampled by the RMS (e.g., the option 2 QMS runs an RMS for the program on their supplier, an independent laboratory runs an RMS). Second-party sampling bodies supply sampling services only to their related organization. A second-party sampling body may form a part of a user or supplier organization, or an intermediate or end customer of the products sampled.
c. Third-party sampling body: The sampling organization is a 3rd party sampling body when it is a separate organization that is not involved in production, supply, purchase or ownership of the products sampled (e.g., an independent company, an inspection body or a CB runs an RMS). It shall demonstrate that it does not have common ownership with the sampled producer, nor have common ownership appointees on the boards (or equivalent) of the organizations, is not directly reporting to the same higher level of management, does not have contractual arrangements, informal understandings or other means that may have an ability to influence the outcome of the sampling.

3.2.1.3. When an RMS uses different combinations of the above; it shall be classified according to the lower level (e.g., an RMS is using partly 2nd and partly 3rd party sampling, it shall be classified as a 2nd party sampling RMS).
When the CB publishes their evaluated RMS, the following needs to be included as the minimum:

a. Residue monitoring system name
b. Certification body performing the evaluation
c. Sampling type (second party sampling/third party sampling)
d. Link or contact details where to get information of producers/ UINs under the scope of the RMS
e. Territorial scope of activity (i.e.: country)
f. Date of evaluation and validity (valid from and valid to date)
g. Multiple CBs in a country or in a region may agree to publish the evaluated RMS with the help of the local National Technical Working Group (NTWG).

3.2.1.4. Basic Requirements

a. The objective of the residue monitoring system is to provide evidence that the use of plant protection products by producers complies with the MRLs in the country of destination of the produce.
b. The system shall be independent from the participating producer(s). A producer group as defined by IndG.A.P. is allowed to operate its own monitoring system.
c. The operator of the monitoring system shall keep current data of the participating producers. This data shall at a minimum include producer name, identification code or UIN where available, address and crop specifications (i.e. product and area).
d. The RMS operator and the participating producer shall have a mutual agreement on service conditions (e.g. a signed application form). These conditions shall specify rights and duties regarding the usage of the monitoring system.
e. Registration is producer and crop specific. The producer needs to arrange other sampling means for those products not included in the RMS and the CB needs to evaluate that during the inspection accordingly.

3.2.1.5. Risk Assessment

a. A risk assessment shall be carried out by the operator of the RMS, not by each producer participating in it.
b. The risk assessment shall take all relevant factors into consideration (e.g., crop/product, climatic conditions, history, active ingredients (AI), size of company and number of Production sites, continuous harvest, country of production PPP registration restrictions, country of destination MRLs, etc.). Reference to sources (data) as evidence for an adequate risk analysis is required. The most critical period and locations should be determined for each crop.
c. The sampling frequency (number of samples to be taken per crop per season) shall be based on this risk analysis and clearly described. (CB 7.6.4. and this same Annex CB 5 above)
d. The analysis method to be used by the laboratories shall be determined. The range of AI to be analyzed by the laboratory shall be defined based on a crop specific risk assessment. The risk assessment shall take into consideration:
   - PPPs that could have been applied on the crop
   - PPPs actually applied
   - Any other contaminants (e.g., persistent environmental residues)
e. The risk assessment shall be carried out annually and result in an annual monitoring plan that includes the products, number of participants, number of samples, period of sampling, and type of analysis.

3.2.1.6. Sample Taking: Sampling shall take place according to the Food Safety and Standards (Laboratory and Sampling Analysis) Regulation, 2011.

a. EU Directive 2002/63/EC or other applicable local regulations. Where these do not exist, ISO 7002 (Agricultural Products), ISO 874 (Fresh Fruit and Vegetables), or Codex Alimentarius CAC /GL 33-1999 shall be followed in case of exports to the EU.
b. Inert bags shall be used which shall be identified correctly (CB 7.6.5. and Annex CB 5). Samples shall be traceable to individual producers. Preferably, the sampling location shall also be recorded (e.g. lot number, field number, greenhouse number, etc.)
c. Sampling shall take place from harvestable or harvested produce.
d. Mixed or pool of samples that contains sampled materials from more producers in sample is not allowed. Composite samples are only allowed on a risk assessment basis and only a lot is made by mixing the produce and sold as such to customers for further processing. Additional reference can be sought from grouping of crops as mentioned by CIBRC.

3.2.1.7. Testing Results

a. The laboratory that carries out the produce analysis shall be ISO 17025 accredited for the relevant testing methods (e.g. GCMS, LCMS).
b. The test results shall be compared with the applicable legislation (country of production and/or country of destination).
c. The test results shall always be reported in writing to the producer concerned.
d. The test results shall be traceable to the farm concerned. Test carried by producer's clients are only valid if they are traceable to producers.

3.2.1.8. Plan of Action

a. Producers shall have a procedure (action plan) for situations when MRLs are exceeded or use of illegal/not approved plant protection products is detected. This procedure can be part of AF 9.1. Recall/Withdrawal Procedure.
b. Producers shall keep records of all actions carried out in connection with incidences related to plant protection product residues.
c. The RMS shall inform the producer and the CB in case of an exceedance of the legal limit. This shall not lead to an automatic sanctioning of the producer; however, the CB shall investigate each case.

3.2.1.9. Records

a. Records (e.g., test results, correspondence with producer and, if applicable, actions taken because of non-compliances) shall be kept for a minimum of 2 years.
b. Records shall include:
    i. System documentation including the risk assessments
    ii. Annual update of the risk assessments including the determination analysis method, the list of active ingredients to be analyzed
    iii. The annual monitoring plan
    iv. Analysis reports
    v. Records of follow up actions
    vi. Communication with producers

vii. Annual summary of the result

c. Producers do not need to keep the records on the farm, but they shall be available during the audit (e.g., made available by the RMS operator on request).

3.2.2. **Residue Management Plan (RMP) as per APEDA**

3.2.2.1. Introduction: APEDA had introduced the residue monitoring plans & Hortinet system for traceability on its website, if producer is intending to export the products under IndGAP, then he shall register farm on hortinet.

3.2.2.2. The farm registration documents shall be verified by inspector, on subsequent steps residue test report in compliance to destination markets mentioned in application form and test reports shall be checked before certification is granted.

4. Harvest related rules

4.1. Harvest Exclusion

4.1.1. If produce is sold in the field before harvest and the buyer is responsible for harvesting, the control point related to harvesting in control points and compliance criteria can be excluded from the producer's certificate. (All the produce from farm is sold and remaining should be treated as waste, if the produce is sold to more than one customer from same plot on grades or market requirements e.g., one grade for export market and remaining grade for domestic market cannot be excluded from harvesting clause). Refer definition Food, Primary Food, Food Business Operator as per Food Safety and Standards Act 2006.

4.1.2. As long as the harvesting process (whether carried out by the producer or subcontracted takes place while the produce belongs to the producer, all points relating to harvest shall be included in the inspection and the certificate.

4.1.3. "Harvest exclusion" applies where the all (100% quantity of all grades excluding wastage quantity) produce does not belong to the producer anymore at some point in time prior to harvest commencing and the producer has no control over the harvesting process. It is also not an activity that is subcontracted by the producer.

4.1.4. The producer shall apply for exclusion per product during registration with detailed justification.

4.1.5. The certification body (CB) will make the decision as to whether harvesting may be excluded or not based on the following requirements. The producer shall have a contract with the buyer that states that the harvester / buyer will do all of the following:

4.1.5.1. Take ownership of the produce before harvesting

4.1.5.2. Take responsibility for ensuring that harvest takes place only after the Pre-Harvest Interval (PHI) has been observed

4.1.5.3. Handle the produce after harvest (not just during harvest)

4.1.5.4. Buy all the produce (harvest exclusion is not possible if the producer harvests some part of the crop and sells another part before harvest)

4.1.6. If the producer does not know the buyer at the time of registration with IndG.A.P., the following shall be provided:

4.1.6.1. A declaration from the producer to inform the buyer (new owner who is harvester AND post-harvest handler) about the pre-harvest interval (PHI)

4.1.6.2. A contract with the buyer as soon as the buyer has been identified that includes all issues under point (v). If harvesting is excluded for the producer or producer group, produce handling shall also be excluded for that producer or producer group.

5. Produce Handling including on farm processing related rules

5.1. Post-Harvest Produce Handling Exclusion

5.1.1. Produce handling includes any type of post-harvest handling of products such as storage, chemical treatment, trimming, washing or any other handling where the product may have physical contact with other materials or substances. On Farm Drying of Spices after harvest by open yard or close cabinet dryer method is included in this clause, whereas mass balance, PP & PO need to be inspected. Details of the specific process (per product) applicable to the producer have to be included in the checklist notes.

5.1.2. If produce handling does not take place under the ownership of the applicant, it shall be declared during registration and indicated on the certificate.

5.1.3. Produce handling shall not be included when harvesting is excluded (see 4.1 'Harvest Exclusion' above).

5.1.4. Produce handling shall always be included as long as the product belongs to the producer during handling (by the producer or subcontractor), unless there is written evidence (contract, agreement, etc.) that the producer has no control over the packing/handling/storage, the product is not returned to the producer and the producer is not responsible for the product anymore.

5.1.5. If a producer does not perform product handling on farm, but at the facility of another producer who does have IndG.A.P. certification (including product handling), the CB may accept another CB's certificate, or the CB may decide to perform its own inspection of the PHU.

5.2. PARALLEL PRODUCTION / OWNERSHIP

5.2.1. In crop certification, parallel production in one production site is not allowed unless there are distinctive visible differences detectable by the average consumer between the certified and non-certified product (e.g., cherry tomatoes and roma tomatoes, red grapes and White skin grapes, Kesar Mango and Alphonso Mango (Geographical Indication Act 1999 & rules Applied for products having certificate from Geographical Indication Registry, Chennai).

5.3. ASSESSMENT PROCESS

5.3.1. **Inspection Timing**

The following rules apply together with the inspection timing rules described in the IndG.A.P. Regulations.

5.3.1.1. Initial (First) Inspections

a. The initial inspection shall cover harvesting activities of each product to be included for certification, as well as produce handling if it is included. Other field work can be checked at a different time where feasible, but this is not obligatory.
b. The inspection shall take place as close to harvest as possible for the inspector to verify as many control points as possible.
c. If the inspection is made before harvest, it will not be possible to inspect certain control points. As a result, either a follow-up visit will be required, or proof of compliance shall be sent by email, photos or other acceptable means. No certificate will be issued until all control points have been verified and all non-conformances have been closed.
d. If harvest takes place before the inspection, the producer shall retain evidence (Video Clips, Photos, Record of transactions) for compliance of control points related to that harvest, otherwise some control points may not be able to be checked and certification will not be possible until the following harvest.
e. The CB shall make sure that in the sampling for unannounced visits, those producers that did not receive a first inspection or the subsequent inspection during harvest have a greater chance of getting an unannounced inspection during the next harvest (this needs to be conveyed to the producer when discussing inspection timing). Additionally, the CB shall make every effort to carry out the subsequent inspection during harvest.
f. Multiple crops: The producer may be seeking certification for more than one crop and the crops may not all have the same seasonal timing, i.e., harvest of one crop does not necessarily coincide with the harvest of other crops. The requirements above are applicable to crop groupings based on similarities in production and harvest processes and their risks. The CB shall verify all control points of these groupings before the product(s) can be added to the certificate. Example: A visit during apple harvesting is not required when apples are being added to a certification scope that already includes pears. However, the apples can only be added to the certificate once all control points applicable to them have been verified. However, adding spinach to the certification scope would require an assessment during the spinach harvesting period.

5.3.1.2. Subsequent Inspections

a. The inspection shall be carried out at a time when relevant agronomic activities and/or handling (but not only storage) are being carried out. Inspection timing shall allow the CB to gain assurance that all registered crops, even if not present at the time of inspection, are handled in compliance with the certification requirements. Inspections off-season or when the farming activities are minimal shall be avoided.
b. If produce handling is included in the certification scope, the produce handling facility(ies) shall be inspected annually. This inspection shall be carried out while in operation. Only when the CB has carried out a risk assessment that

clearly shows that the risk is low, can produce handling be inspected during operation once every 2 years. The risk assessment should take into account the product(s) being packed as well as known food safety incidences related to the respective product(s) and any directives from IndG.A.P. to look at specific points. The CB shall keep justification of the reason for the chosen inspection timing on record. This exception is only applicable for Option 1 producers without QMS.

c. If produce handling is excluded from the certification scope, inspection has to be scheduled during harvest season at least every 2 years. In the respective year, the harvest season of at least one registered product per product grouping has to be inspected. Crop groupings are based on similarities in production and harvest processes and their risks. The CB shall keep justification of the reason for the chosen inspection timing and the crop groupings used on record.

   Crops may be grouped according to the following:

   i. Mechanical harvest: The only method of harvesting. In this case there is no need to observe the harvest while in operation. It is sufficient to check only the machine and harvesting machine operation related records after or before the harvest.
   ii. Manual harvest of low-risk products. The product is low risk when:
      - Always cooked before eating, or
      - Always cleaned before eating i.e., cannot be eaten without cleaning, or
      - Dry nuts, Dried Spices on Farm or
      - Products with inedible skin or shell, or
      - Product with pathogen reduction step after harvest (still unprocessed) and/or,
      - No known food safety incidences related to the respective product
   iii. Manual harvest of high-risk products. All other products that are not under ii.) are considered as high risk.
   iv. Harvest that involves water or ice
   v. Packing in field

d. If the producer does not commit to continue with the certification for the next cycle, the CB shall make sufficient provisions to avoid situations where one certificate could be used to cover more than one harvest and growing cycle of the same annually harvested crop, e.g., by shortening the certificate validity. The CB can set the deadline for reconfirmation according to the harvest period of the crop.

e. Example: Harvest season for blueberries is the entire month of October. The first inspection takes place during October 2015 and the certificate is issued from the end of November 2015 to the end of November 2016. This certificate may cover the harvest and sales of the 2015 and 2016 harvests. Therefore, the CB shall set the deadline for reconfirmation (re-acceptance of the product), e.g. for October 1st, 2016 and if the producer does not reconfirm by that date, the CB shall shorten the validity of the certificate.

f. Multiple consecutive crops: During the inspection, the production process of all crops included in the certification scope shall be assessed on farm via site visits, interviews with the producer and workers, review of documents, records, etc. The producer shall keep evidence of compliance with the applicable control points for all registered crops.
g. In the years during which there is no requirement to carry out the inspection during harvest season and where crops do not have the same seasonal timing, the CB shall select a date where relevant agronomic activities can be seen on farm for at least one of the products.

5.3.1.3. Unannounced Inspections (Option 1 only)

a. If during a producer transfer the incoming CB has not seen the harvest season of all products included in the certification scope, an unannounced inspection (within the 10 % rule) shall be scheduled during the following 12 months, in order to inspect the harvest process of products not seen.

5.3.2. **Inspection of Product Handling Units (Option 2 and Option 1 Multisites with QMS)**

5.3.2.1. In fruit and vegetables, for the annual CB audit the square root of the total number of central product handling sites registered (those where the products of more than one grower is handled) shall be inspected while in operation. If there is only one central product handling facility, it shall be inspected every year.

5.3.3. **Inspection Duration**

5.3.3.1. The inspection duration shall allow for an opening meeting with the farm management, a complete evaluation of all standard requirements, completion of the applicable checklist and the presentation of the results to the producer.

5.3.3.2. The usual IndG.A.P. production site inspection duration for IndG.A.P. Crops are between 3 and 8 hours (Option 1 producer).

5.3.3.3. The minimum of 3 hours duration shall apply to the simplest circumstances (one location, one or few crops, simple machinery, few workers, no produce handling, subsequent inspection, documentation is well organized, etc.).

5.3.3.4. Option 2 producer group members might have inspections of shorter time duration depending on the complexity of the farming situation.

5.3.3.5. Factors that will increase the minimum of 3 hours (the list is not exhaustive and is applicable for Option 1 and for Option 2 members) are as follows:

a. Initial inspection
b. Addition of new crops during subsequent inspections
c. Addition of new locations during subsequent inspections
d. Storage included
e. Produce handling included
f. Different types of products (product groups)
g. Multiple sites and locations
h. More sub-scopes
i. Subcontractors used (not checked by third party)

5.3.3.6. The internal inspection of producer group can be based as per crop stages and risk factors involved in that stage, the time duration of minimum three hours can be divided appropriately and mentioned in checklist, some clauses of infrastructure can be audited once in year whereas PHI, MRL May Need to audit more frequently, refer RMS & crop List.

6. Sales & Trading including Traceability related rules

6.1. SOP for issuing Unique Identification Number (UIN)

6.1.1. Unique Identification Number (UIN): UIN is issued by CBs, which is mentioned in Producer register along with GGN for same producer.

6.1.2. The UIN is a 10-digit producer or producer group identification number given to every producer registered for certification. Once the production process on the farm is successfully certified, the producer can print this number on their product packaging. The number identifies where the product was produced, and retailers can use it to verify their suppliers.

6.1.3. In combination with the UIN label and IndG.A.P. logo, the UIN enables us to give you the transparency you need and allows one to track your product back to its roots.

6.1.4. The UIN will be issued in following manner in UIN register by a CB:

CB code	Year Code	Option Code	Producer Code
01	22	01	0001

6.1.5. As UIN is a number associated with the person who is responsible for the site for which IndG.A.P. certification is applied.

6.1.6. A separate UIN register to be maintained by the CB and need to be available to QCI on weekly basis once the certificate is issued

6.1.7. To issue the UIN, the CB has to check that person is valid legal person by checking Aadhar UID card or appropriate photo id issued by government (to avoid duplication of persons and ghost farmers) in case of producer group or firms, legal entity, the appropriate business document issued by state or central government of India shall be checked.

6.1.8. After step 2, the person can attach as many sites as possible to managed by him. To register the farms / sites he had to provide GPS location of each site should be given in application form to CB (the google map link of said site can be shared, where farms can be flagged, once in a year or there is major change) or need to be verified in inspections of sites/PHUs. Along with GPS location, the producer can provide other documents provided by government organisations and or valid lease / farm management agreement not less than certificate validity period. This will help to avoid duplication of sites and ghost farms,

6.1.9. After verification of both identities of producer and site the CB will issue the UIN as following method:

CB code	01	To be issued by QCI	This can be suspended or cancelled in case of sanctions by AB / QCI
Year Code	22	YY	From 1 Jan 22 to 31 Dec 22
Option Code	01	Certification option	01: option 1 a CB can issue 9999 individual UIN in a year

			02: option 2 producer group certificates only, a CB can issue 9999 individual UIN in a year 03 to 09: members of producer group a CB can issue 7 X 9999= 69,993 individual UIN for producer members who are registered option 2 in a year This can be suspended or cancelled in case of sanctions by CB
Producer Code (PMO/ FPO/Group code)	0001		This will be issued by CB as per serial number of the UIN register maintained by CB for that period which could be of 06-digit number.

6.1.10. Suspended or cancelled or transferred UIN are termed as **frozen UINs** which cannot be used for minimum three years or until sanction is revoked. There are two statuses of UIN, which will always be part of UIN register

6.1.10.1. Certificated Active

6.1.10.2. Frozen

6.1.11. There is no need for the CB to modify or update anything in the IndG.A.P. Database. If the products are not re-accepted for the next cycle, once the current certificate expires, the new CB will be able to accept the UIN of the producers and re-certify.

6.1.12. The paper certificate shall match the information available in the IndG.A.P. registry for that UIN at the time of issuing.

6.1.13. In case client moves from one CB to another, the UIN no. will be continued for the purpose of continuity and traceability.

6.1.14. In case client moves from one CB to another, the CB transferring the client shall close the registration process before handing overall details including the UIN no. will be continued for the purpose of continuity and traceability.

6.1.15. For the registration to be completed, the applicant shall be assigned a UIN after completion of first certification process, if they don't already have a UIN.

6.1.16. If a producer who has already been registered changes CB or applies to a new CB for certification of a different product, the producer shall communicate the UIN to the new CB. Failure to do so will result will result in aborting the process for both Option 1 producer and an Option 2 producer group.

6.1.17. The UIN is used to validate the certificate. It is made available via the identification of the final products with the producer, where the product originates from a certified process, which is an obligation for all producers registered for PP/PO.

6.1.18. Unique Identification Number (UIN) is issued by concerned CBs. The UIN identifies a registered or certified producer and may only be used as indicated in the CPCC. It cannot be used to label a product that is not certified. The UIN (e.g. UIN_1234567890) may appear on the product, consumer packaging of the product, or at the point of sale where in direct connection with individual certified products. The UIN shall only be used on transaction/sales documents including certified products. When the transaction/sales documents include certified and

non-certified products, the certified items shall be clearly identified as required by the relevant All Farm Base control points and compliance criteria.

6.1.19. The legal entity that labels UIN shall be a holder of a valid certificate of a IndG.A.P. module or an equivalent standard/scheme certificate.

6.1.20. On termination of the 'IndG.A.P. Sublicense and Certification Agreement', the right of the producer to use the IndG.A.P. claim, including the trademark, UIN or the logo, terminates with immediate effect.

6.1.21. The UIN shall only be used in connection with the IndG.A.P. system.

6.1.22. The operator of the monitoring system shall keep current data of the participating producers. This data shall at a minimum include producer name, identification code or UIN where available, address and crop specifications (i.e. product and area).