



# I'MO Always Informed

IMO Control Private Limited, 1314, Double Road, Indiranagar 2<sup>nd</sup> Stage, Bangalore-38



**For Private Circulation Only**

**June 2007**

Dear Friends,

The inspections of 2007 are well under way and we would like congratulate all our operators on the improvements made after the visits in 2006. As expected, there are many developments that require immediate attention from all concerned and we would like to bring these to your notice right away!

Umesh Chandrasekhar, Director

## **NOP non compliances**

We are informed by APEDA that the USDA-NOP audit team that came to India in December 2006 has listed the following four areas of non-compliances in their report on the conformity assessment and technical application of NOP standards by the Certification Bodies in India.

1) (i) In-complete information on inputs (including processing aids) in the System Plan submitted by the applicant before inspection.  
(ii) Certification is carried out even when the certification body does not receive the relevant information required from the operator within the specified time.

2) Records of certified operations (including Grower Groups) concerning the production, harvesting, and handling of agricultural products are not being maintained in compliance with § 205.103 of NOP standards.

**3) Cow urine and cow urine based products are used as foliar sprays in production certified as per the NOP standards. However, cow urine may be used only as manure according to the NOP regulations.**

4) Group certification norms as per NOP/NOSB

(National Organic Standard Board) criteria for certification of grower groups are not implemented.

**Therefore, it is essential that all the operators certified according NOP requirements take the necessary steps immediately to achieve complete compliance with the NOP requirements, particularly item 3 in the above list.**

The NOSB criteria for grower groups may be downloaded from

[http://www.imo.ch/portal/pics/IMO\\_CH/documents/nosb\\_recommondations\\_growergroups\\_2002.pdf](http://www.imo.ch/portal/pics/IMO_CH/documents/nosb_recommondations_growergroups_2002.pdf)

## **Labels/Markings**

We came across many instances of incorrect labels/markings that were being used without getting the draft versions approved by IMO. Only the logos given below can be used on the labels/markings of products that are certified to be **organic**.



**NPOP/NAB/003**

The India Organic Logo cannot be used on in-conversion products and inputs approved for use in organic agriculture. There can be no further reference to **IMO Switzerland, SCES 004, APEDA/ORG/002/2001** or the old IMO logo. **It is essential that you send the draft labels/markings to IMO and obtain approval prior to printing. Labels/markings/any other PR materials will not be accepted whenever they are not approved by IMO before printing.**

### **Off farm inputs**

We find that the complete specifications of all the ingredients, including the inert materials, present in many off-farm inputs listed in the standards such as Potassium Sulphate, Sulphur formulations, Copper formulations and trace elements are not being obtained from the concerned manufacturers, in spite of repeated reminders. We want to inform you that any missing information regarding the ingredients, specially the inerts, will make the concerned off-farm inputs unacceptable for use in the certified operations. Further, the natural origin of materials like Magnesium Sulphate, Rock Phosphate, Gypsum, Sulphur and Dolomite should be sufficiently substantiated for these to be acceptable. **Please use any off farm input only after acceptance by IMO on the basis of the availability of all necessary information. Compliance to this requirement is essential to retain the certification status of your organic operations.**

### **Notification of changes to IMO**

Any change in the certified operations, such as new fields/areas, new producers, new products, changes in the processing facility or method, changes in the recipe, new warehouses, new addresses, new clients etc. that may occur in between the annual inspections must be **IMMEDIATELY** communicated to IMO. The immediate notification of any change to IMO will help avoid delays in the certification process.

### **NOP & JAS**

Operators who want to go for NOP and/or JAS certification in 2007 are requested to apply for the same **immediately**. There are many requirements to be completed before the

respective compliances can be verified during the annual inspections.

### **Renewal of license to use India Organic Logo**

All authorized users of the India Organic Logo are requested to apply for renewed licenses within the current validity period.

