

### OneCert Sanction Policy for Grower Group

OCI will enforce sanctions on the Grower Group if the ICS is not able to uphold OCI policies and standards.

*Note: - If during the inspection any one farmer of the group find with major non compliance or using the prohibited material, change the risk status of the group to high risk and increase the number of farmers audited accordingly. The following conclusions can be drawn after auditing the sample farmers.*

1. If during audit no farmer was found in non compliance, no non compliance will be issued for failure of farmer audits.
2. If any farmer was found in non compliance and the group is conversion period, a major noncompliance will be issued to the group and the observation on the ICS will be made. The decision on granting certification to the group will be proposed till next inspection. If the group is in final year of conversion the sample size will be increased.
3. If any farmer is found with a major noncompliance, then the inspector must investigate the probable cause of the major NC. For example, if the NC action occurred after the most recent internal inspection, it may be possible that it would have been discovered by the internal inspector. If it occurred before, then the internal inspection was not sufficient. Possible causes could range from inadequate training of farmers to deliberate fraud. Ask the ICS manager and internal inspector to explain, if possible.
4. If after increasing the sample audits first time and no other farmer was found in non compliance, then the OCI reviewer may decide that ICS inspection must be conducted again with report submitted in 3 months time or as early as possible, with consideration of harvest time of crop. ICS will need to identify the farmers in non compliance and report to OCI. After receiving the updated Internal inspection report the OCI inspector will again inspect the operator and report its findings to OCI office. The OCI reviewer may decide that other sanctions may also be appropriate.
5. If more farmers are found in non compliance after increase of sample size, then it will be considered that ICS not operating at all and the report will be submitted to reviewer, who will sanction the group. The group would need to undergo conversion period once again.

Below are examples of non compliance and actions to be taken, which include sanctions to be taken upon grower group. The sanctions and actions taken are not limited to those listed below.

Level	Issue	Category	Sanction	Action Taken
1	<ul style="list-style-type: none"> <li>- Application of compliant inputs without prior approval</li> <li>- Failure to follow approved Organic System Plan</li> <li>- Failure to follow approved ICS Manual</li> </ul>	Minor Issue	n/a	Notification to the grower group that must be resolved prior to next inspection or by specific due date

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<p>2</p>	<ul style="list-style-type: none"> <li>- Failure to notify certification body of new procedures. Those new procedures are not compliant.</li> <li>- Failure to maintain production records and for traceability.</li> <li>- Farmer selling product their product individually instead of under single entity</li> <li>- Application of prohibited substance</li> <li>-</li> </ul>	<p>Notice of Noncompliance</p>	<p>n/a</p>	<p>Notice of noncompliance sent to client. The client must submit corrective actions to the certification body within specific time period</p>
<p>3</p>	<ul style="list-style-type: none"> <li>- Any Noncompliance not resolved by group within specified time period</li> <li>- Use of GM seeds/seedlings/planting stock</li> <li>- Application of prohibited substance</li> </ul>	<p>Sanction</p>	<p>Applies</p>	<p>Entire grower group will be sanctioned and must complete the conversion period again.</p>