



Organic Certifications Pvt. Ltd.

Bengaluru,  
September 24, 2026.

**CIRCULAR: URGENT COMPLIANCE NOTICE: ADHERENCE TO THE 90/45-DAY RENEWAL RULE FOR GROWER GROUP AND OTHER ACTIVITIES, TRACENET DATA COMPLETION, TRANSITION TO DIRECT LABORATORY SAMPLING PAYMENTS, AND CLEARANCE OF OUTSTANDING DUES**

**Ref. No.:** ADITI/HO/2026/CIRCULAR/016

Dear Valued Certified Partner,

First and foremost, we extend our heartfelt gratitude for your continued partnership with Aditi Organic Certifications Pvt. Ltd. (AOCPL). Your dedication to organic and sustainable farming and stewardship remains the cornerstone of India's organic integrity and global standing. Over the years, our shared collaboration has enabled countless farming families to participate in accredited value chains with credibility and trust. We are sharing this compliance advisory outlining few major aspects related to organic certification.

**1. Regulatory Mandates and Tracenet Software Realities**

As you are aware, the National Programme for Organic Production (NPOP) administered by APEDA has mandated stringent compliance checkpoints within the Tracenet software ecosystem. Foremost among these is the non-negotiable requirement of completing 100% internal inspection for the grower group and online document submission prior to the scheduling of annual external follow-up inspections or the renewal of Scope Certificates. Hence it is imperative that all the ICS managers as well as internal inspectors are adequately trained.

While we fully acknowledge and sympathize with the initial technical bottlenecks and data migration challenges encountered within the newly updated Tracenet interface, regulatory deadlines remain absolute. Failure to upload and verify required baseline records on Tracenet creates a systemic impasse: the Tracenet 2.0 will not provide provision to the Certification Body (CB) to execute planned on-site external follow-up audits and renewing scope certificates without complete system records.

**2. Strict Enforcement of the 90-Day Renewal Submission Rule for grower groups and 45-Day for other activities**

In accordance with AOCPL Standard Operating Procedures and NPOP guidelines, please take notice of the following mandatory timelines:

Registered Office :  
No. 38, 1st & 3rd Floor, 20th Main Road, First Block, Rajajinagar, Bengaluru - 560 010 India  
Phone : 0091-80-2332 8134 / 2332 8135 / 2332 8136  
Email: aditi@aditicert.net, aditiorganic@aditicert.net

CIN : U01409KA2007PTC042101 GST : 29AAGCA1987P1ZV

**Submission Window:** All renewal applications from grower groups, updated Organic Management Plans (OMPs), updated farmer lists, and associated Tracenet records must be fully submitted at least 90 days prior to the expiration date of your current Scope Certificate as the renewal window opens 180 days prior to scope expiration.

Other activities may submit relevant documents 45 days prior to expiration date of your current Scope Certificate as the renewal window opens 90 days prior to scope expiration.

**Clarification of the Grace Period:** There will be no grace period. Renewal procedure including external inspection and certification process must be carried out before scope expiry.

**Consequence of Default:** Submissions tendered past the above threshold jeopardize timely inspection and certification scheduling. If verification and file submissions are not complete before scope expiration, project will no longer be active on tracenet 2.0 and hence TCs and related activities cannot be performed.

### **3. Hercules Task of Outstanding Dues: Immediate Settlement Required**

Over successive audit cycles, the recovery of operational fees and inspection costs from operators has developed into an unsustainable administrative burden.

**Contractual Terms:** In line with our standard client agreement (CON-7.2.1), fees are due upon invoice receipt, with an applicable grace period of 15 days. Delays attract a 2% interest charge per contract conditions.

**Service Blockage:** Effective immediately, no inspection schedules, committee reviews, or Transaction Certificates (TCs) will be processed for accounts carrying past-due balances. All pending certification invoices must be cleared prior to on-site audit mobilization.

### **4. Subcontracted Lab Sampling: Transition to Direct Payment Mechanism**

Under NPOP Chapter 5 and ISO 17065 controls, external sampling (including mandatory 2%) may be executed through authorized representatives of accredited subcontracted laboratories.

**To resolve ongoing financial friction and streamline the chain of custody:**

**Direct Invoicing & Payment:** Beginning with the current operational cycle, laboratory testing and sampling mobilization fees must be settled directly by the Operator to the subcontracted accredited laboratory.

**Proof of Settlement:** Operators must present proof of payment/clearance directly with the subcontracted laboratory prior to sample dispatch and testing report generation.

**Interdependence with TC Issuance:** Because Transaction Certificates (TCs) are contingent upon validated analytical test results aligned with lot traceability in Tracenet, delays in lab payment will automatically stall TC approvals.

### 5. Summary of Action Items Required Within 15 Days

| SI. No. | Required Action                                                                                                                      | Verification Milestone               |
|---------|--------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| 1.      | <b>Tracenet Verification:</b> Mobilize ICS internal staff to complete all pending farmer data entry and documentation in Tracenet.   | Minimum baseline verified in system. |
| 2.      | <b>Account Reconciliation:</b> Clear all past outstanding invoices due to Aditi Organic Certifications.                              | AOCPL Accounts Clearance Receipt.    |
| 3.      | <b>Lab Coordination:</b> Ensure direct payment arrangements are finalized with authorized subcontracted labs for scheduled sampling. | Direct Lab Payment Confirmation.     |
| 4.      | <b>Renewal Filing:</b> Submit complete OMP and renewal files immediately if your certificate expires within the next 45 days         | Tracenet Workflow Initiation.        |

We value our ongoing association and urge your senior leadership and ICS management teams to treat this notification with the highest level of urgency, ensuring continuity of your organic certification status.

Yours sincerely,

For Aditi Organic Certifications Pvt. Ltd.

For ADITI ORGANIC CERTIFICATIONS PVT. LTD.

Narayana Upadhyaya  
Managing Director

