

## Policy on Labelling

<b>1</b>	<b>Aim</b>
	This policy establishes minimum requirements for usage of organic terms and various conditions related to the usage of certification mark and logos as per specific schemes.
<b>2</b>	<b>Background</b>
	This document provides an overview of labelling requirements for organic products, addressing especially the “India Organic”, “USDA Organic” and “Biologique Canada” logo. Regardless of which standard a product is certified to, organic products must meet the labelling requirements of the country in which they are sold. Different countries also have different rules for using their organic logos.
<b>3</b>	<b>Normative framework</b>
<b>3.1</b>	<p><b>NPOP</b></p> <p><b>3.1.1 Chapter 3 : Appendix 5 Organic Food Processing And Handling</b></p> <p><b>6.Labelling</b></p> <p><b>6.1 Labeling Requirements:</b></p> <p>(i) Labelling shall convey clear and accurate information on the organic status of the product.</p> <p>(ii) When the full standards requirements are fulfilled, products shall be sold as "produce of organic agriculture" or a similar description.</p> <p>(iii) The label for conversion products shall be clearly distinguishable from the label for organic products by mentioning the year of conversion.</p> <p>(iv) The name and address of the person or company legally responsible for the production or processing of the product shall be mentioned on the label.</p> <p>(v) Product labels should list processing procedures, which influence the product properties in a way not immediately obvious. All components of additives and processing aids shall be declared.</p> <p>(vi) Additional product information shall be made available on request.</p> <p>(vii)Ingredients or products derived from wild production shall be declared as such.</p> <p><b>6.2 Processed products</b></p> <p><b>(i) Organic</b></p> <p>-For Single Ingredient</p> <p><b>(ii) Certified Organic/Organic</b></p> <p>-For Multi-ingredient: &gt;95% ingredients, including additives are of organic Origin.</p> <p>-Should Logo of Certification programme</p> <p><b>(iii) "made with organic ingredients"</b></p> <ul style="list-style-type: none"> <li>• Less than 95% and more than 70%</li> </ul> <p>The word "organic" may be used on the principal display in statements like "made with organic ingredients" provided there is a clear statement of the proportion of the organic ingredients. An indication that the product is covered by the certification programme should be used, close to the indication of proportion of organic ingredients.</p> <p><b>(iv) Less than 70% Organic Content</b></p> <ul style="list-style-type: none"> <li>• The indication that an ingredient is organic may appear in the ingredients list. Such product may not</li> </ul>

be called "organic".

### Declaration of ingredients

- Added water and salt not to be considered in % calculation
- All raw materials shall be listed in order of their weight %
- Herbs and spices constituting less than 2% shall be listed as spices or herbs.
- Organic products shall not be labelled as Genetic Engineering (GE) or Genetic modifications (GM) free. Any reference to GM/GE free shall be limited to production methods on product labels.

### 3.1.2 CHAPTER 6 Organic Certification Mark

**India Organic logo:** Only exporters, manufacturers, and processors whose products are duly certified by the accredited Certification Bodies, will be granted the licence to use of the logo which would be governed by a set of regulations.



The Indian Organic Logo must comprise of the colour specifications listed below: -



C -70 M -10  
Y -100 K -0



C -70 M -20  
Y -100 K -10



C -10 M -0  
Y -80 K -15



C -10 M -80  
Y -80 K -0



C -55 M -15  
Y -0 K -0

- Every application for the grant of a licence to use the Certification Trademark shall be made to the Accredited Certification Body on Form 1 prescribed in the NPOP from time to time.
- If, after having regard to requisite skill, resources, production, processing previous performance and antecedents relevant to the issuance of the licence, the Accredited Certification Body, is satisfied that the applicant is fit to use the Certification Trade Mark, the Accredited Certification Body shall grant a licence in Form 2 authorizing the use of the Certification Trade Mark in respect of the product or class of products manufactured by the applicant in respect of the process employed in any production, manufacture or work, subject to such terms and conditions as specified in these regulations.
- A licence shall be granted on Form 2 prescribed in the NPOP from time to time for a period of one year and a declaration by licensee shall be given on Form 3.

### 3.2 NOP

#### Summarising Labelling Requirements under NOP-USDA Regulations.

##### 205.300 Use of the term “organic”

The use of the term “organic” and its derivations is only allowed for use on certified organic products and ingredients. This applies to all products comprised of agricultural products, regardless of end use. For products sold as organic in the United States, the products must be produced in compliance with the NOP regulations and certified by a NOP-accredited certifying agent or produced in compliance with an equivalency agreement.

Organic products destined for sale in countries outside of the U.S. may be produced and labeled according to the receiving country’s standards as long as they are clearly labeled for export only.

#### Product Composition

##### (i) 100% Organic

–All agricultural ingredients and processing aids must be organic.

##### (ii) Organic

–95% of product must be certified organic agricultural products.

##### (iii) Made with Organic [specified ingredients or food groups]

–At least 70% certified organic

##### (iv) Less than 70% organic

–Only use “organic” on ingredient statement.

##### (i) A. 100% Organic

Products labeled as 100% organic may only contain certified organic agricultural ingredients. All processing aids, such as flocculants or filters, must be certified organic ingredients.

##### B. 100% Organic Content

May say “100% Organic” or “Organic”

- May use NOP seal
- May display ADITI logo
- Not more prominent than NOP seal
- May make percentage claim
- Note size restriction
- May display other ADITI seals
- Records must be available

Note: The size of the percentage statement must not exceed one-half the size of the largest type size on the panel on which the statement is displayed and must appear in its entirety in the same type size, style, and color without highlighting.

##### (ii) Organic

Products labeled as “Organic” must contain at least 95% certified organic agricultural ingredients. The remaining 5% may be non-organic agricultural ingredients from 205.606 that are not commercially available in organic form or non-agricultural or synthetic ingredients from 205.605 No GMO, sewage sludge, or irradiation.

#### 95% or more Organic Content

May say “Organic”

- May make a percentage statement
- Percentage statement must not exceed ½ the size of the largest type on the panel.
- Must be entirely the same type, style, size, and color, without highlighting



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**(iii) Made with Organic [specific food groups or ingredients]**

Products labeled as “Made with Organic [specific food groups or ingredients] must contain at least 70% certified organic agricultural ingredients (excluding salt and water).

Remaining 30% ingredients may be

- Non-organic agricultural ingredients
- Non-agricultural, non-organic ingredients from 205.605 of the National List of Allowed and Prohibited Substances produced without GMO, sewage sludge, or irradiation.

On the Principal display:

- May state “made with organic (insert up to three ingredients or ingredient categories).”
- May make a percentage statement
- Percentage statement must not exceed ½ the size of the largest type on the panel.
- Must be entirely the same type, style, size, and color, without highlighting.
- Must not include USDA organic seal anywhere, represent finished product as organic, or state “made with organic ingredients.”
- Information panel: Must identify organic ingredients (e.g., organic dill) or via asterisk or other mark.

**(iv) <70% Organic Ingredients (excluding salt and water)**

- Must not include USDA organic seal anywhere or the word “organic” on principal display panel
- May only list certified organic ingredients as organic in the ingredient list and the percentage of organic ingredients. Remaining ingredients are not required to follow the USDA organic regulations.

**Ingredient Statement**

- Each ingredient used in the product must be included in the ingredient statement on the container’s information panel. Organic ingredients must be identified as being organic.
- As an option, an asterisk (\*) may be used to identify organically produced ingredient.
- It is permissible to make mandatory allergy warning statements as shown in this example.

**Mandatory Information**

Name of Certifier

“Certified organic by Aditi Organic Certifications Pvt. Ltd.” or similar phrase must appear on the information panel below information identifying the handler or distributor of the finished product.

Certified products may use the ADITI’s logo to meet this requirement if the seal states “certified by...”

**Livestock Feed**

May display:

- “100% Organic” or “Organic
- USDA Seal
- Mark of certifying agent
- Not more prominently than NOP seal
- The term “organic” to identify organic ingredients
- Must display “Certified organic by [ADITI]
- Must comply with other Federal and State feed labeling requirements.

**205.307 Non-retail Containers**

- Must display:
  - Production or lot number
  - Information must be traceable to documentation supporting the organic status of the product
- May Display
  - Name and contact information of Certifier.
  - Organic designation
  - Handling instructions to maintain organic integrity
  - NOP seal
  - ADITI seal
  - Production or lot number

**205.307(c) Export Containers**

- May be labeled to meet destination country’s requirements.
- Shipping containers and documents must display:
  - “For Export Only”
- Handler must maintain export and marking records.

**205.308 Unpackaged Retail**

1) May label as “100% Organic” or “Organic”

- Retail displays
- Labeling
- Display containers
- Organic content must be identified in ingredient statement
- If facility is certified, they may display:
  - Certified organic
  - Use the NOP seal
  - ADITI seal

**2) Made with Organic” retail displays**

- Must not list more than 3 ingredients or food groups.
- Organic ingredients in ingredient statement must be labeled as organic.
- If prepared in a certified facility, retail displays, display containers and market information may display the ADITi’s seal, logo, or identifying mark.

**205.310 Exempt or Excluded Operations**

- Products produced on exempt or excluded operations must not:
  - Display NOP seal or ADITI’s seal or other identifying mark.
  - Be represented as certified organic or containing organic ingredients.
- May be represented as organic by the exempt operation
- May not be represented as organic by others.

**USDA Seal §205.311**

b) The USDA seal must replicate the form and design of the example in figure 1 and must be printed legibly and conspicuously:

- (1) On a white background with a brown outer circle and with the term, “USDA,” in green overlaying a white upper semicircle and with the term, “organic,” in white overlaying the green lower half circle; or
- (2) On a white or transparent background with black outer circle and black “USDA” on a white or transparent upper half of the circle with a contrasting white or transparent "organic" on the black lower half circle.
- (3) The green or black lower half circle may have four light lines running from left to right and disappearing at the point on the right horizon to resemble a cultivated field.



**3.3 3.3.1 Organic claims on food labels**  
**Use of the organic logo on organic products**

The CFIA regulates the use of the Canada organic logo below (Figure 1). The use of the organic logo is only permitted on products that have an organic content that is greater than or equal to 95% and have

been certified according to the requirements of the Canada Organic Regime. The use of the organic logo is voluntary but when used it is subject to the requirements of the SFCR [359(1), SFCR].



The logo is displayed in either black with a white background, in black with a transparent background or in colour. If displayed in colour, the background is white or transparent, the outer and inner borders are green (Pantone no. 368), the maple leaf is red (Pantone no. 186) and the lettering is black [Schedule 9, SFCR].

Imported products must meet the requirements of the Canada Organic Regime.

Imported products that bear the logo must include: the statement “Product of”, immediately preceding the name of the country of origin, or the statement “Imported”, in close proximity to the logo. These statements must appear on the label in both French and English, unless a bilingual labelling exemption applies [354(d), 355(3), SFCR].

**9.2 Categorization of organic products**

Based on the percentage of their organic ingredients, organic products fall into two categories:

**9.2.1 95% organic content (or more)**

Such products may not contain an ingredient in both organic and non-organic form.

**9.2.2 70-95% organic content**

Such products may not contain an ingredient in both its organic and non-organic form.

C.7.1 The CB shall not issue a certificate for any multi-ingredient organic product unless it verifies that the organic ingredients used in the product formulation have been certified as organic in accordance with part 13 of the SFCR by a CFIA accredited CB or to the terms of an organic equivalence arrangement by a CB accredited under the existing organic equivalency arrangements.

**CAN/CGSB-32.310-2015**

Annex A (informative)

Categorization of organic products

Table A.1 – Categorization of organic products based on their percentage of organic ingredients

Summary	Categories		
	95% <sup>a</sup> (or more)	70-95% <sup>b</sup> (or more)	<70% <sup>c</sup>
May not contain an ingredient in both its organic and non-organic form.	✓	✓	
May contain up to 5% non-organic ingredients if the organic form is not commercially available.	✓		
May contain up to 30% non-organic ingredients.		✓	
May contain less than 70% organic ingredients.			✓
Non-organic ingredients both “classified as food additives”, and “not classified as food additives,” shall be listed in Tables 6.3 and 6.4 of CAN/CGSB-32.311, meet the specified annotations and comply with 6.2 of CAN/CGSB-32.311.	✓	✓	
Whether listed or not in Tables 6.3 and 6.4 of CAN/CGSB-32.311, agricultural, non-organic ingredients shall meet 1.4 a), c) and h), and 6.2 of CAN/CGSB-32.311.	✓	✓	
Non-listed agricultural, non-organic ingredients are subject to commercial availability requirements	✓		
Non-organic processing aids of agricultural origin are	✓	✓	





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	permitted, subject to the requirements of 1.4 a), b), c), and h); and any annotations listed in Table 6.5 of CAN/CGSB-32.311.			
	Non-agricultural processing aids are permitted if they are listed in Table 6.5 (processing aids) of CAN/CGSB-32.311.	✓	✓	
	<p>a Products compliant with 9.2.1 may be identified as organic.          B Products compliant with 9.2.2 may only declare the percentage of organic ingredients.          C Products with less than 70% organic content may identify which ingredients are organic in their ingredient list. For full labelling requirements refer to current regulations</p>			
	<p><b>3.3.2</b>  <b>Guide to Organic Labelling in Canada.</b>  <b>What is organic?</b>          Only products with 95% or more organic content may carry the Canadian Organic Logo.</p> <p>Having the logo is not mandatory, but it is a trusted symbol that is helpful for consumers. There are no restrictions as to size or location of the logo on your label.</p> <p><b>Obtaining the Canada Organic logo for your Product:</b>          You must obtain the Canada Organic logo from Certification Bodies accredited by the CFIA or Certification Bodies recognized under an organic trade arrangement with a foreign competent authority.</p> <p><b>Using the Canada Organic logo for Imported Products:</b>          Imported products carrying the Canada Organic logo on their labels or PLU stickers must indicate ‘product of’ immediately preceding the name of the country of origin, or the statement ‘imported’ in close proximity to the logo. NB: If you are looking to use the logo for purposes other than labelling a product, you must request permission from the CFIA.</p> <p><b>Name of certification body</b>          The product must be certified by a CFIA-accredited Certification Body and the name of that certifier MUST appear on the label.</p> <p>The name of the Certifying Body can appear anywhere on the product, including the front label, except the bottom of the container. Minimum type size for the certifier’s name is 1.6mm based on the lower-case letter “o”.</p> <p>If an organic claim is made on a PLU sticker, the name of the Certification Body must also appear on the PLU.</p> <p>The statement “Certified Organic” is not acceptable, only “Certified by X Certifying Body” is acceptable. This may seem minor, but if products are labelled ‘Certified Organic’ and others are not, it may lead the consumer to believe only products claiming to be ‘Certified Organic’ are certified.</p> <p><b>Organic claims for multi-ingredient products</b></p> <p>Products with 95% or greater organic content: Multiple-ingredient products greater than or equal to 95% may be labelled as organic and may display the Canada Organic logo.</p> <p>Only products with 95% or greater organic content may label or advertise using the words:</p> <ul style="list-style-type: none"> <li>- Organic;</li> <li>- Organically grown;</li> <li>- Organically raised;</li> <li>- Organically produced.</li> </ul> <p>Or similar words including abbreviations of, symbols for, or phonetic renderings of those words. There is no limit to print size or font for these statements.</p>			



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A maximum of 5% of non-organic ingredients may be used only if not commercially available in organic form. The cost of organic ingredient(s) is not a criterion for 'commercially available'. You cannot claim that the product is '100% organic' under the Organic Product Regulations (OPR). Though, you may see the '100% organic' claim on a US certified product. You can say the product is "98% organic" if that claim is true, but it must be verifiable.

Multi-ingredient products with 70-95% organic content: These products may carry the declaration "Contains XX% organic ingredients," with the percentage rounded down to the nearest whole number. All numbers, signs or symbols in this declaration must be of the same size and prominence. Minimum print size is 1.6mm, based on the lowercase letter "o". There is no maximum print size. The declaration can appear on any panel, including the front panel. They must identify the organic ingredients in the list of ingredients. Unlike in the 95% or greater organic category, non-organic ingredients may be used (even if there is a commercially available organic alternative). However, the use of organic and non-organic versions of the same ingredient is not permitted.

Must be certified by a CFIA-accredited Certification Body and the certifier's name must appear on any label or PLU making an organic claim.

Multi-ingredient products with less than 70% organic content:

May only carry organic claims in the product's ingredient list.

May NOT be labelled as 'organic' or carry the Canada Organic logo. These products do not require certification.

However, the organic ingredients contained within these products must be certified, and the manufacturer must keep records identifying the certifier.

### **Determining the percentage of organic Ingredients**

The percentage of organic content in a multi-ingredient product is determined in accordance with the Canadian Organic Standards (CAN/CGSB32.310) which are incorporated into law by reference in the OPR .

Only single ingredient products can be used to determine the percentage of organic content in a multi-ingredient product.

For example, all the multi-ingredient products making up organic bread must be broken down into their component ingredients to calculate the product's final percentage of organic content. Organic bread could contain a four-grain mix, with some grains organic, some not however this would not be used to determine the percentage. The four-grain mix must be broken down into individual grains – barley, oat, rye and spelt.

**It gets trickier:** Solid Products: Divide the total net mass of combined organic ingredients in the formulation or finished product, whichever is more relevant, by the total mass of all ingredients.

**Liquid Products:** Divide the fluid volume of all organic ingredients by the fluid volume of all ingredients if the product and ingredients are liquid. If the liquid product is identified on the principal display panel as reconstituted from concentrates or by similar phrases, the calculation uses the single-strength concentrations of the ingredients or finished product.

**Solid and Liquid Products:** Divide the combined mass of solid organic ingredients and the mass of the liquid organic ingredients by the total mass of all ingredients in the finished product.



**Livestock feed:** If you are producing livestock feed, it must contain 100% organic agricultural ingredients and the necessary feed additives or supplements (see s. 5.2 of CAN/CGSB32.311). Divide the total net mass (excluding calcium compounds) of combined organic ingredients in the formulation or finished product, whichever is more relevant, by the total mass (excluding calcium compounds) of all ingredients.

NB: For the purposes of calculating ingredients, water and salt are not included.

**Other labels and import/export requirements**

As a consumer, you will often see other products with labels, other than the recognized Canada Organic logo, on the shelves. This is mostly facilitated by equivalency arrangements, which Canada has with five other countries – United States;

- European Union;
- Switzerland;
- Japan; and
- Costa Rica.

Equivalency arrangements make trading in organic products easier, by eliminating the need for dual certification. These arrangements state that Canada’s products, if certified to the OPR, do not need to be certified to the trading country’s standards. However, each arrangement is unique and may have additional criteria. For products being traded to the US, “Certified in compliance with the terms of the US-Canada Organic Equivalency Arrangement” must appear on documentation accompanying shipments of organic products, produced under the terms of the arrangement. Depending on what documentation is used, this statement may appear on the organic certificate, transaction certificate, bill of lading, or purchase order.

Canadian products exported to the EU under the Canada-EU Organic Equivalency Arrangement must be accompanied by a “Certificate of Inspection for Import of Organic product into the European Community”.

At all times, when importing a product to Canada, you must be able to demonstrate that the product meets the requirements of the OPR, or the terms of the relevant equivalency arrangement.

**3.4 Usage of ADITI Logo**



**Description of Aditi logo**

**CONCEPT OF ADITI LOGO**

Outer ring symbolise earth and cosmic forces represented by the orange colour. It also indicates the soil biodiversity, both flora and fauna protected. The inner grass blades with green represents healthy plants grown in environment friendly ecosystem. It indicates approval status of the product. The orange dot authenticates “Organic” nature of the finished product with full of pure nature’s energy.



**SPECIFICATIONS of Logo**

The Aditi’s Logo must comprise of the colour specifications listed below:

Orange	Green
C – 0	C – 100
M – 60	M – 60
Y – 80	Y – 100
K – 0	K – 0

ADITI Accreditation number, shall accompany ADITI logo for approved organic products, intended for Export to different countries.

- NPOP being NPOP/NAB/0017 (Domestic sale in India and Export to US and other countries based on equivalence)

	<ul style="list-style-type: none"> <li>• EU being IN-ORG-001 (NPOP certified unprocessed product categories to the EU)</li> <li>• COS being COR01204046 (For products being exported to Canada and other countries from India as per equivalence to COS standards)</li> </ul>
<b>3.5</b>	<p><b>Voluntary Certification Schemes</b></p> <p><b>VCSMPP GAP &amp; GFPC:</b></p> <ul style="list-style-type: none"> <li>• All packages/containers legibly labeled with product name, plant part, month and year of harvest and the name of collection centre.</li> <li>• The basic information about the plant species, area of collection, and time of collection, regulatory information etc., should be captured.</li> <li>• Each lot contains month of collection on its label and FIFO (First in first out) is followed for its movement.</li> </ul> <p><b>INDGAP</b></p> <p style="text-align: center;"><b>INDGAP PREMIUM AND BASIC LOGOS</b></p> <div style="display: flex; justify-content: center; gap: 20px;">   </div> <ul style="list-style-type: none"> <li>• All producer or producer groups that have been certified under the INDGAP Certification Scheme by the certification bodies approved by Scheme Owner and have been formally approved by the same, are eligible to use of the Scheme Certification Mark.</li> <li>• The Mark shall be used on any document accompanying the lot of certified produce along with the address of the certified farm to indicate to the recipient that the produce is GAP-certified.</li> <li>• The Mark may be used in publicity material, pamphlet, letter heads, other similar stationary; media for exchange of any communication, for promoting the awareness of the Scheme, or the Mark, etc.</li> </ul>
<b>3.6</b>	<p><b>Summary of the Bio Suisse Standards</b></p> <p><b>Information note for operations outside of Switzerland (version 01/2020)</b></p> <p><b>15. Trade and declaration</b></p> <ul style="list-style-type: none"> <li>• Bio Suisse only recognizes products that are transported by land or by sea.</li> <li>• BIOSUISSE ORGANIC products that are destined to be imported to Switzerland must have the phrase 'BIOSUISSE ORGANIC' or the 'BIOSUISSE ORGANIC' logo (see below) on containers, delivery notes, invoices, etc. Containers for export must carry the logo. Templates of the logo may be downloaded from the Bio Suisse website.</li> <li>• The Bud trademark is protected by copyright. Neither the trademark nor the Bud designation may be used by BIOSUISSE ORGANIC certified operations.</li> <li>• BIOSUISSE ORGANIC products must always be clearly identifiable in the physical flow of goods and in bookkeeping.</li> </ul> <div style="display: flex; justify-content: space-around; margin-top: 20px;"> <div style="border: 1px solid green; padding: 10px; text-align: center;"> <p><b>BIOSUISSE</b></p> <p><b>ORGANIC</b></p> </div> <div style="border: 1px solid black; padding: 10px; text-align: center;"> <p><b>BIOSUISSE</b></p> <p><b>ORGANIC</b></p> </div> </div>
<b>4</b>	<p><b>Terms</b></p> <p><b>Labelling:</b> Display of information about a product on its container, packaging, or the product itself. It shall convey clear and accurate information on the organic status of the product.</p>

<b>5</b>	<b>Policy</b>	
	<p>As a minimum, ADITI will implement the above-mentioned requirement: The label must allow to identify the entity responsible for the product (producer or trader) along with Certifier and the accreditation number. Ingredients which are used in Multi-ingredient product recipes are to be checked for their organic origin (Supplier certificates/Equivalency conditions of the certificate/relevant certifier accreditation)</p> <p>Reference to "organic". It is highly recommended to identify the product as "organic" e.g. organic cashew kernels or 100% organic cashew kernels (NOP). The operator has to submit the drafted label (on product or off product/publications) for ADITI's review/approval before printing. Product specification form (4.5.12) has to be submitted for each multiple ingredients product. Any change in the percentage or ingredient usage must be communicated to ADITI.</p>	
<b>6</b>	<b>Related Documents</b>	<ul style="list-style-type: none"> <li>• This policy is available to all interested public.</li> <li>• It must be handed out to all ADITI certification and inspection personnel</li> <li>• It must be handed out to all post-harvest handlers interested in certification</li> </ul>
<b>7</b>	<b>Access to this policy</b>	<ul style="list-style-type: none"> <li>• Brief information on organic labelling (3.2.24 inf)</li> <li>• Product Specification form (4.5.12 form)</li> <li>• NPOP Form 1, 2 &amp; 3</li> <li>• Label assessment Forms</li> <li>• <a href="https://www.canada-organic.ca/sites/default/files/organic_labelling_in_canada_booklet_aug2018.pdf">https://www.canada-organic.ca/sites/default/files/organic_labelling_in_canada_booklet_aug2018.pdf</a></li> </ul>

#### Revision history:

Revision date	Version	Description of Changes
10/09/2020	03	Normative Framework, background-section has been modified as per relevant standards.