

### Policy on information transfer and disclosure

<b>1</b>	<b>Aim</b>
	This policy aims to obtain the maximum transparency in certification processes for all involved parties, without affecting the necessary principles of confidentiality.
<b>2</b>	<b>Background</b>
	<p>Internal and external communication plays a key role in modern enterprises. The success of our certification body depends on a high degree of communication exchange in a effective manner to both inspectors and clients. Staff and clients are updated regularly concerning changes in regulation, ADITI policies and procedures.</p> <p>ADITI also makes it a priority to exchange information with the Accreditation bodies/Conformity verification Bodies relating to breaches/violations/frauds affecting the organic integrity or on any Certification decisions which lead to Cancellation of certificates/termination of contract.</p>
<b>3</b>	<b>Normative framework</b>
	<p><b>3.1 ISO/IEC 17065:2012</b></p> <p><b>4.6 Publicly available information</b></p> <p>The certification body shall maintain (through publications, electronic media or other means), and make available upon request, the following:</p> <p>a) information about (or reference to) the certification scheme(s), including evaluation procedures, rules and procedures for granting, for maintaining, for extending or reducing the scope of, for suspending, for withdrawing or for refusing certification.</p> <p>b) a description of the means by which the certification body obtains financial support and general information on the fees charged to applicants and to clients.</p> <p>c) a description of the rights and duties of applicants and clients, including requirements, restrictions or limitations on the use of the certification body's name and certification mark and on the ways of referring to the certification granted</p> <p>d) information about procedures for handling complaints and appeals</p> <p><b>(Annex A): A.4 Confidentiality and openness</b></p> <p><b>A.4.3 Openness</b></p> <p>A certification body needs to provide access to, and disclosure of, appropriate and timely information about its evaluation and certification processes, as well as about the certification status of any product (i.e. granting, maintaining, extending or reducing the scope of, suspending, withdrawing or refusing certification), in order to gain confidence in the integrity and credibility of certification. Openness is a principle of access to, or disclosure of, appropriate information.</p> <p><b>A.4.4 Access to information</b></p> <p>Any information held by the certification body on a product that is the subject of an evaluation and/or certification should be made accessible, upon request, to the person or organization that contracted the certification body to undertake the certification activity.</p> <p><b>3.2 NPOP-CHAPTER 4</b></p> <p><b>4.2.10 Public Information</b></p> <p>(i) The Certification Bodies shall actively inform the public of the scope of its certification and the contents of the standards.</p>

(ii) The Certification Bodies shall have a documented policy for public information.

**4.2.18 Other functions**

(iii) Information available in the public as well as advice through newsletters, seminars etc, may be offered to the operators by the Certification Body in a nondiscriminatory manner.

**4.4.5 Withdrawal of certification**

In case of any violation by the operator, the accredited Certification Body shall withdraw certification from the operator for a specified period and inform about their decision to APEDA and shall also publish the same on their website.

**4.4.11 Exchange of Information**

(i) In case of irregularity or infringements observed by the Certification Body of its registered operator, it shall without delay inform APEDA.

(iii) When APEDA observes and finds any irregularity or infringement, it will inform all the Certification Bodies about such infringement. It may also reflect such infringement in its official website.

**4.5.8 Accreditation contract**

Such an accredited Certification Body shall then sign an accreditation contract and code of conduct.

The accredited Certification Body shall also submit the fee structure leviable on operators for

various activities and shall also display it prominently on their website and office site.

**3.2 NOP-USDA**

**§205.501 General requirements for accreditation.**

(a) A private or governmental entity accredited as a certifying agent under this subpart must:  
 (8) Provide sufficient information to persons seeking certification to enable them to comply with the applicable requirements of the Act and the regulations in this part;

**§205.504 Evidence of expertise and ability.**

A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques.

(b) (5) A copy of the procedures to be used, including any fees to be assessed, for making the following information available to any member of the public upon request:

- (i) Certification certificates issued during the current and 3 preceding calendar years;
- (ii) A list of producers and handlers whose operations it has certified, including for each the name of the operation, type(s) of operation, products produced, and the effective date of the certification, during the current and 3 preceding calendar years;
- (iii) The results of laboratory analyses for residues of pesticides and other prohibited substances conducted during the current and 3 preceding calendar years; and
- (iv) Other business information as permitted in writing by the producer or handler; and

**3.3 COS-COR V18**

**C.2.8 Suspension and cancellation**

C.2.8.2 The CB shall report to its CVB all suspensions, change of a CB by an operator, and cancellations it issues on the 25th of each month, in case such decisions are made, or shall be provided as defined by the CVB. All reports shall include the name of the holder of certificate, the date of issue and the reason for the action.

C.2.8.4 The CB shall submit to the CFIA a request for removing the name of the holder of certificate from the list of cancelled holders of certificates posted on the CFIA web site.

C.2.8.5 The CB shall proceed with granting a certification after receiving conformation from

the CFIA that the operator is removed from the CFIA list.

### **C.5 Issues regarding implementation of the standard**

C.5.1 The CB shall notify all of its certificate holders of any amendments to the regulations or the standards within 2 months after their publication.

C.5.2 The CB shall allow a period of up to 12 months after the publication date of an amendment to CAN/CGSB-32.310, CAN/CGSB-32.311 and CAN/CGSB-32.312 for applicants to come into compliance with any changes to the requirements.

C 5.3 Some of the revisions in the standards may require more than 12 months to implement, such as barn renovations to comply with new flock sizes, exit spaces and natural lighting in poultry installations. When applicable, any period longer than 12 months is specified within the standards.

C.7.15 The CB shall exchange any information deemed confidential with other CFIA accredited CBs and/or CFIA to verify the validity of information on a holder of certificate. Such exchange is still considered to be and shall be managed as confidential by the receiving party.

### **3.4 ICB AG and BioSuisse**

#### **BioSuisse standards**

#### **Appendix to Part V, Chapter 3.8 – Products that carry potential risk**

#### **1. General Requirements**

Positive test results must be reported without undue delay to the certification body (in conformance with the terms of the contract with the certification body) and to Bio Suisse (by means of the Notification form for residues in Bud products, which is available on [www.bio-suisse.ch-Import](http://www.bio-suisse.ch-Import) with Bio Suisse Residues & Pest management -Procedures for residues).

#### **3.5 IndG.A.P.**

##### **3.5.1 Publicly available information**

Making the information publicly available through the CB's website shall be the only means of meeting this requirement.

The following information with respect to IndG.A.P. certification scheme shall be made publicly available on the CB's website. The information provided shall be accurate, non-misleading and where relevant detailed enough for the reader to clearly understand.

a) The certification process, from application stage to the grant of certification, including the evaluation process; the system for maintenance of certification, including processes for surveillance, market sampling, recertification, scope extension and reduction, suspension and withdrawal. The information shall also cover the terms and conditions of certification and the use of certificates IndG.A.P. mark, as contained in the Certification Agreement.

b) The IndG.A.P. scheme specific rules and conditions for granting, for maintaining, for extending or reducing the scope of, for suspending, for withdrawing or for refusing certification.

c) Requirements of IndG.A.P. certification scheme, including the IndG.A.P. certification criteria and application form shall be available to the applicant. The CB may also provide any other guidance documents on the certification criteria for the benefit of the applicant, as long as they are not advisory/consultative in nature. d) The certification body shall make publicly available on its website, the information about applications registered and certifications granted, suspended or withdrawn.

e) On request from any party, the certification body shall provide the means to confirm the validity of a given certification and the provision for the same shall be made available on the website.

f) The certification body shall maintain and make publicly available on its website, a directory of valid certifications. Please also see additional requirements given in the document “IndG.A.P. Certification Process”.

g) a description of the rights and duties of applicants and clients, including requirements, restrictions or limitations on the use of the certification body's name and certification mark and on the ways of referring to the certification granted.

3.5.2 The CB shall have procedure for frequent updating of the information on its website. The responsibilities for ensuring accuracy of the information made available on the website, ensuring frequent updates, etc shall be documented.

3.5.3 The CB shall list out the sources of its finances.

3.5.4 The information on complaints handling process and the CB’s procedure shall be directly available to the public, without the public having to go through layers of cross linkages.

### **3.5.5 Information exchange between a certification body and its clients**

**3.5.5.1 Information on the certification activity and requirements-** The certification body shall provide and update clients on the following:

- a) a detailed description of the initial and continuing certification activity, including the application, initial evaluation, surveillance evaluation, and the process for granting, maintaining, reducing, extending, suspending, withdrawing certification and recertification;
- b) the certification criteria for IndG.A.P. certification scheme;
- c) information about the fees for application, initial certification and continuing certification;
- d) the certification body's requirements for prospective clients;
- e) documents describing the rights and duties of certified clients as well as obligations on part of the certification body including the changes within certified IndG.A.P. producer that need to be informed to the certification body [see clause 4.1.2.1.1h) of this document];
- f) information on procedures for handling complaints (both by the certification body as well by the IndG.A.P. producer, in respect of complaints against certified products) and appeals.
- h) Certification bodies shall actively cooperate with IndG.A.P. during management of complaints related to the CB or to the producers contracted by the CBDont.

3.5.5.2 Based on the changes affecting certification, including those initiated by the client the certification body shall decide upon the appropriate actions in accordance with its documented procedure, which shall be based on the requirements described in “IndG.A.P. Certification Process” as well as clause 7.10.3 of ISO 17065. Responsibility for deciding about the course of actions to be taken shall also be documented.

### **3.6 EU Regulation 848/2018**

#### ***(EU) 2018/848 Article 43 Additional rules on the exchange of information***

Article 43.2 In cases where suspected or established non-compliance has been identified with regard to products under the control of other control bodies, control bodies shall immediately inform those other control bodies.

Article 43.3 Control bodies shall exchange other relevant information with other control authorities and control bodies.

Article 43.4 Upon receiving a request for information that is justified by the need to guarantee that a product has been produced in accordance with this Regulation, control bodies shall exchange with other competent authorities, as well as with the Commission, information on the results of their controls.

***(EU) 2021/1698 Article 20 Systems and procedures for the exchange of information***

Article 20.1 The control body shall use the Organic Farming Information System (OFIS) for the exchange of information with the Commission, with other control authorities and other control bodies, and with the competent authorities of the Member States and of the third countries concerned.

Article 20.2 The control body shall take the appropriate measures and establish documented procedures to ensure timely exchanges of information with the Commission and with other control authorities and control bodies.

***Article 21 Exchange of information between the Commission, control authorities, control bodies and competent authorities***

1. The control body shall immediately share information with the Commission, with other control authorities and control bodies, and with the competent authorities of the Member States and of the third countries concerned on any suspicion of non-compliance that affects the integrity of organic or in-conversion products.

2. Where a control body is notified by the Commission, after the Commission has received a notification from a Member State in accordance with Article 9 of Implementing Regulation as regards suspected or established non-compliance affecting the integrity of imported organic or in-conversion products, it shall carry out an investigation in accordance with Article 22 of (EU) 2021/1698 Regulation. The control body shall inform the Commission and the Member State that sent the initial notification (notifying Member State), using the template set out in Annex III to (EU) 2021/1698 Regulation. The control body shall reply within 30 calendar days from the date of receiving that notification and shall inform about the actions and measures taken, including the results of the investigation and provide any other information when available and/or required by the notifying Member State.

3. The notified control body shall provide further necessary information if requested by the notifying Member State.

4. Where operators or groups of operators and/or their subcontractors are subject to controls by different control bodies, those control bodies shall exchange the relevant information on the operations covered by their control activities.

5. Where operators or groups of operators and/or their subcontractors change their control body, the new control body shall request the control file of the operator or group of operators concerned from the previous control body. The previous control body shall, within 30 days, provide to the new control body the control file of the operator or group of operators concerned and the written records referred to in Article 14, the status of the certification, the list of non-compliances and the corresponding measures taken by the previous control body.

	<p>The new control body shall ensure that non-compliances noted in the report of the previous control body have been addressed by the operators or groups of operators.</p> <p>6. Where operators or groups of operators are subject to a traceability check and a mass balance check, control authorities and control bodies shall exchange the relevant information allowing finalisation of these checks.</p>
<b>4</b>	<p><b>Terms:</b> Control Body: ‘control body’ means a delegated body, or a body recognised by the Commission or by a third country recognised by the Commission for the purposes of carrying out controls in third countries for the import of organic and in-conversion products into the Union.</p>
<b>5</b>	<p><b>Policy</b></p> <p>In order to provide a more accessible service to our customers and to inform the public as much as possible, ADITI publishes the following documents on its website:</p> <ul style="list-style-type: none"> <li>• Parts of this Quality Manual,</li> <li>• Lists of all certified operators updated monthly,</li> <li>• All relevant information relating to our Certification System includes information about the certification process, fees and many more.</li> </ul> <p>ADITI ensures data transfer as per requirements mentioned in section 3 in a timely manner with complete transparency. All the procedural requirements along with the rules and regulations concerning the evaluation process, including complaint addressal are made public by publishing the same in their website and also in related documents/periodicals/emails/Boucher, etc. Within the application process, the potential clients receive a set of documents, containing contract(s), sanction catalogue, offer(s), information about the requested standard(s), Application for Organic Certification and a template for the Organic Management Plan (in the case of organic certification).</p> <p>ADITI offers appropriate know-how in what refers to the correct implementation of the standards, as far as this is relevant for the respective operator. This is not considered consultancy in the sense of ISO 17065:2012. It is seen as integral part of the standard’s requirements to inform the applicant about the certification procedure and the standard itself.</p> <p>ADITI notifies without any delay to its accreditation body regarding any irregularity or infringements of its registered operator or the products ADITI certifies.</p>
<b>5.1</b>	<p><b>Keeping staff informed:</b></p> <ul style="list-style-type: none"> <li>• ADITI will provide inspectors and other interested staff copies of all relevant regulations and relevant parts of the Quality Manual</li> <li>• ADITI will inform all inspectors and other interested staff with a maximum delay of one month about changes in relevant regulations, policies and procedures. Besides the respective regulation text, an easily understandable explanation will be provided.</li> <li>• ADITI management and headquarter staff meets at least once per month, among others to exchange all relevant information.</li> </ul>
<b>5.2</b>	<p><b>Staff participation in decisions:</b></p> <p>Whenever possible, before making decisions, all potentially involved or affected staff should be informed and encouraged to give their opinions and comments. The management shall</p>



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	take into account the criteria expressed by the staff.
<b>5.3</b>	<p><b>Keeping clients informed:</b></p> <ul style="list-style-type: none"><li>• ADITI will provide clients or applicants for certification copies of the respective standard(s), if possible, in a language understandable for them, accompanied by easily understandable summaries of the most important requirements.</li><li>• ADITI will publish certification policies and most parts of the Quality Manual on its website, in order to make structures and procedures as transparent as possible. These will be checked for correctness annually.</li><li>• All ADITI staff will give clients or other interested public satisfying information upon requests concerning standards, policies, or procedures.</li><li>• Inspectors or other local ADITI representatives are responsible for informing all local clients immediately about relevant changes in regulations, policies, or procedures.</li></ul> <p>The following kind of documents will always have to be provided in a locally understandable language:</p> <ul style="list-style-type: none"><li>- Organic Management Plans</li><li>- Brief information</li><li>- ADITI Policies</li><li>- Contracts</li></ul> <p>If necessary, the inspector will have to translate all non-conformities and remediation measures into a language understandable to the operator. The operator and the inspector have to sign them.</p>
<b>5.4</b>	<p><b>Keeping Accreditation Bodies (AB's)/Conformity Verification Bodies (CVB's) informed:</b></p> <ul style="list-style-type: none"><li>• ADITI will provide data related to the certified clients along with details of certification decisions (Suspension/Cancellation/Withdrawal) in a timely manner.</li><li>• Any data deemed necessary shall be provided to the ABs/CVBs within the stipulated time.</li><li>• Any incidents affecting the organic integrity of the product shall be notified on priority. (Aditi informs, ICB AG within one week in case of changes in the certification status, violations and sanctions, positive residue analyses are detected concerning BioSuisse certified operations)</li></ul>
<b>5.5</b>	<p><b>Keeping Peers informed</b></p> <ul style="list-style-type: none"><li>• Incidences of frauds and any information required to assist investigation of any residue identified shall be shared with other Certification bodies.</li></ul>
<b>5.6</b>	<p><b>Keeping the subcontractor informed</b></p> <ul style="list-style-type: none"><li>• ADITI will provide data related to the Subcontractor's requirement as well and as per the requirement mentioned in section 3 of this document.</li><li>• ADITI does not share any client-related information with any subcontracted until it is the requirement of the concerned. Also, such information will only be provided with properly signed declaration CON 7.2.3 by the client for sharing the information.</li><li>• In the case of subcontracted laboratories, only sampling forms containing Operator</li></ul>



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	registration number or lot number, barcode information available on the sampling bag will be shared with them. For the payments purpose company Legal details will be shared as per the requirement.
<b>5.7</b>	<b>Information transfer in the OFIS portal</b> <ul style="list-style-type: none"><li>ADITI will provide data related to the OFIS cases requirement as well and as per the requirement mentioned in section 3 of this document.</li><li>ADITI will keep regular check on OFIS portal for the collect any information from the commission.</li><li>ADITI will provide the required information on OFIS portal within 30days of receiving requirement along with all relevant documents from the concerned bodies.</li></ul>
<b>6</b>	<b>Access to this policy</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></ul>
<b>7</b>	<b>Related documents:</b> <ul style="list-style-type: none"><li>INF-3.2.0 Brief Information for the clients on respective certification scope</li><li>CON-7.2.3 Client's Declaration on information Disclosure</li></ul>

## 8. Revision History:

Revision date	Version	Description of Changes
07/10/2020	02	<ul style="list-style-type: none"><li>Normative Framework section has been modified as per relevant standards.</li><li>Updated ADITI logo with ® mark</li></ul>
25/11/2020	03	<ul style="list-style-type: none"><li>The sections 5.4 and 5.5 have been included.</li><li>Normative references have been updated as per BioSuisse.</li></ul>
09/11/2022	04	<ul style="list-style-type: none"><li>Normative framework has been updated as per the EU 2018/848 requirements.</li></ul>
19/12/2022	05	<ul style="list-style-type: none"><li>Normative Framework has been updated with 848 and 1698 regulation of EU.</li><li>Section 5.6 has been added for the subcontracted bodies.</li><li>Section 5.7 has been added for the OFIS portal exchange of information</li></ul>
09/01/2023	06	<ul style="list-style-type: none"><li>Update requirements as per EU.</li></ul>
16/03/2023	07	<ul style="list-style-type: none"><li>Updated as per IndG.A.P.</li></ul>
16/06/2023	08	<ul style="list-style-type: none"><li>Updated as per IndG.A.P.</li></ul>
09/11/2023	09	<ul style="list-style-type: none"><li>Updated as per IndGAP requirements and closures.</li></ul>