



Policy on Certificate Transference/Suspension /withdrawal /Cancellation/Termination		Doc No.: Pol. 4.2.13.1
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1	Aim
	Mutual acceptance and transference of certificate issued by different Certification Bodies.
2	Background
	<p>Certification programs based on independent standards are feasible only if mutual recognition of accredited certification bodies (CBs) is given. This is relevant for organic and other standards. While some CBs apply criteria of "friends" and "enemies" for recognizing or refusing recognition of certificates issued by other CBs, ADITI will always recognize certificates issued by CBs holding the relevant accreditation, except for situations, where special reasons require caution.</p> <p>Aditi may have to continue the inspection and certification of the operator who got the certification services from other CBs. In this case, Aditi always asks for the inspection report of the last inspection of the previous CB and the details of non-conformities raised/detected. Also, Aditi shall request any details related to Complaint history (e.g., involvement in OFIS cases). These details are requested while the operator applies for the inspection and certification services.</p> <p>or</p> <p>Aditi's existing operator wants to shift their certified project to another CB/s for various reasons. In this case, Aditi will process such a request as soon as all outstanding issues related to previous inspection and certification services have been settled including payments. Aditi certification contract with the operator will automatically terminate once the No Objection Certificate (NOC) has been issued through Tracenet of APEDA in case of NPOP/NOP certification.</p>
3	Normative framework
3.1	NPOP
	<p>Chapter 4 Accreditation Of Certification Bodies</p> <p>4.4.10 Shifting of Operators: When an operator wants to change his Certification Body, he shall apply for the No Objection Certificate (NOC) on Tracenet to the existing Certification Body. The Certification Body shall issue the NOC resulting in an on line transfer of the operator file along with the reports to the subsequent Certification Body. The new Certification Body shall ensure that the non-conformities reported by the earlier Certification Body are closed before issuance of scope certificate.</p> <p>Advisory: Procedures for transfer of the Operators during Suspension/Termination of a Certification Body under NPOP</p> <ol style="list-style-type: none"> 4) The operators of the suspended CB are required to apply for No Objection Certificate on Tracenet for transfer to another CB within 15 days 5) The new CB will forward the request to APEDA officially of their acceptance of the transferred projects within 7 days 6) Following this process, the operators in the suspended CB account will be given a NOC by APEDA for transfer to another CB of their choice (only once). Within 7 days 7) The new CB will be able to register the operator (NOC No. provided by APEDA) after inspection (within one month) 8) Resulting the transfer of the entire data of the operator to enable the new CB to go for inspection and verification before continuation of certification (inspection to be completed within one month) 9) The process of transfer is given below for different types of the operators. Resulting the transfer of the entire data of the operator to enable the new CB to go for inspection and

	<p>verification before continuation of certification (inspection to be completed within one month)</p> <ul style="list-style-type: none"> • The process of transfer is given below for different types of the operators <ul style="list-style-type: none"> ▪ In case of Grower Group: The new Certification Body will physically verify the ICS location and existence of farmers practising organic farming before the approval of NOC on Tracenet. ▪ In case of Processor: The new Certification Body will verify the stock ready for Processing & Processed by visiting the processing unit before issuance of any Certificate on Tracenet. ▪ In case of Trader: After acceptance of NOC, the certification Body will do the physical verification of the stock and submit their report to APEDA before issuance of any certificate. ▪ In case of export consignment ready for shipment: The new Certification Body after accepting the NOC of the operator will verify the ready consignment for export before issuance of Provisional Transaction Certificate (PTC).
3.2	<p>C.10 Requirements when an operator changes a CB under COR</p> <p>C.10.1 Requirements on the operator</p> <p>C.10.1.1 The operator who decides to change their current CB (sending) to a new CB (receiving) shall submit an application for certification as a new applicant, complete an application form prescribed by the new CB (receiving) and follow the application requirements as per C.2.1 of the COR Operating Manual.</p> <p>C.10.1.2 The operator, including those who intend to become part of a grower group, shall notify their current CB of their intent to change the CB and shall request a "letter of good standing" (Appendix G) to be sent to the new CB (receiving), confirming that all nonconformities (NCs) and any contract conditions (for example, outstanding fees) have been addressed. The current CB shall send this letter directly to the new CB. If necessary, the receiving CB can directly request additional information to the sending CB.</p> <p>C.10.1.3 The operator shall maintain their current certification until the new certification process is complete and the new CB has issued documents confirming the certification of the operator's products as per section 345(2) of the SFCR.</p> <p>C.10.1.4 The operator shall stop using the certificate issued from the sending CB after the new certification process is complete and the operator has received the new certificate.</p> <p>C.10.1.5 The operator shall not use up existing supplies of labels that identify their previous CB on products they produce from the moment the operator receives the new certificate. New labels identifying the new CB must be used at once.</p> <p>C.10.1.6 The operator may sell certified prepackaged products labelled with the name of the previous CB as long as these products were packaged before the CB change and an inventory list was provided to both CBs.</p> <p>C.10.2 Requirements on the sending (current) CB</p> <p>C.10.2.1 The sending (current) CB shall, upon request by the operator, send a letter of good standing to the new CB (receiving) confirming that all NCs and any contract conditions (for example, outstanding fees) have been addressed by the operator. A letter of good standing shall only be issued when an operator is in the process of changing CB and when all NCs have been addressed by the operator.</p> <p>C.10.2.2 The sending CB shall continue to monitor the operator's compliance with COR requirements and shall ensure that the operator resolves any outstanding NCs before the new certificate is issued by the new (receiving) CB.</p> <p>C.10.2.3 The sending CB shall notify the operator that it terminates the certification agreement with the operator and will no longer monitor the compliance of this operator once the new CB confirms that a new certificate has been issued to the operator.</p> <p>C.10.2.4 Upon receiving confirmation from the new CB that a new certificate has been issued to the operator, the sending CB shall require the operator to immediately stop the use of any labels or</p>

	<p>advertising that identify the sending CB on the operator's products.</p> <p>C 10.2.5 The sending CB shall allow the operator to retain a copy of the current certificate only when the operator can demonstrate that previously certified products are still in inventory.</p> <p>C 10.2.6 The sending CB shall report the cancellation in a monthly report to the CFIA as a "cancellation due to a CB change".</p> <p>C.10.3 Requirements on the receiving (new) CB</p> <p>C.10.3.1 The receiving CB shall require the operator to submit an application for certification as a new applicant, complete an application form prescribed by the new CB (receiving) and follow the application requirements as per C.2.1 of the COR Operating Manual.</p> <p>C.10.3.2 The receiving CB shall request information on the name of the applicant's current (sending) CB.</p> <p>C.10.3.3 The receiving CB shall review the information provided by the sending CB including the letter of good standing.</p> <p>C.10.3.4 The receiving CB shall schedule and conduct an on-site inspection of the operator's facility as per C.2.3 of the COR operating manual prior to making a certification decision.</p> <p>C.10.3.5 The receiving CB shall issue a new certificate only after the certification process is complete and the applicant has been determined to follow all the COR requirements. The initial date on the new certificate shall be the date on which the receiving CB issued the certificate.</p> <p>C.10.3.6 The receiving CB shall inform the sending CB within 5 working days that the receiving CB has issued a new certificate to the operator.</p>
3.3	<p>Eu 848/2018 regulations:</p> <p>Art 39. Additional rules on actions to be taken by the operators and groups of operators.</p> <ul style="list-style-type: none"> • To accept the transfer of the control file in the case of a change of control authority or control body or, in the case of withdrawal from organic production, the keeping of the control file for at least five years by the last control authority or control body. • to immediately inform the competent authority or the authority or body designated in accordance with Article 34(4) in the event of withdrawal from organic production. • to accept the exchange of information among those authorities or bodies if subcontractors are subject to controls by different control authorities or control bodies. <p>Article 43. Additional rules on the exchange of information</p> <ul style="list-style-type: none"> • In addition to the obligations laid down in Article 105(1) and Article 106(1) of Regulation (EU) 2017/625, competent authorities shall immediately share information with other competent authorities, as well as with the Commission, on any suspicion of non-compliance that affects the integrity of organic or in-conversion products. • Competent authorities shall share that information with other competent authorities and the Commission via a computer system that enables the electronic exchange of documents and information made available by the Commission. • In cases where suspected or established non-compliance has been identified concerning products under the control of other control authorities or control bodies, control authorities and control bodies shall immediately inform those other control authorities or control bodies. • Control authorities and control bodies shall exchange other relevant information with other control authorities and control bodies. • Upon receiving a request for information that is justified by the need to guarantee that a product has been produced following this Regulation, control authorities and control bodies shall exchange with other competent authorities, as well as with the Commission, information on the results of their controls. • Competent authorities shall exchange information on the supervision of the control bodies



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	with national accreditation bodies as defined in point (11) of Article 2 of Regulation (EC) No 765/2008 of the European Parliament and of the Council (1).
4	Terms
	NOC (No Objection Certificate): Is a document/certificate stating that the CB doesnot object to the transfer of operator to a new CB. (As per NPOP, Standards). Letter of good standing: Letter from the Current CB confirming that all nonconformities (NCs) and any contract conditions have been addressed. (As per COR).
5	Policy
	Aditi always makes sure: <ul style="list-style-type: none">• The certificate is issued according to the same standard, which is requested by the operator, mentioning explicitly the respective standard.• The certificate is valid: In the case of certificates, which do not carry a validity date (e.g. NOP/COS): still, the certificate should not be older than 12 months. In case it is older, always check through the CB's website or through direct communication with the issuing CB, whether the certificate is still valid.• The CB is accredited for the respective standard. This can be checked e.g. through the accreditor's website, or by requesting the CB to submit a copy of their accreditation document. Recognition of NAB/National accreditation bodies, Govt. of India (check APEDA website www.apeda.gov.in).• In order to transfer certified projects to another CB, the operator has to apply for the No Objection Certificate (NOC) through Tracenet or a Letter of Good standing in case of COS. The request will be processed within three working days provided the conditions mentioned in point no. 2 of this document are compiled. Aditi also provides the soft copy of the last inspection report with details of open non-conformities to the concerned CB upon request.• ADITI takes decisions on the basis of initial evaluation of the documents submitted by the operator and previous control body. If a risk is identified while checking documentation w.r.t to the project, a physical inspection is initiated from Aditi's end prior to issuance of a Transaction Certificate for the NOC acceptance.• Labels (Certification mark) approved by the previous CB would be verified and the operator would have to apply for a fresh application for grant of such license to use certification marks, which includes India Organic logo and/or NOP-USDA or COS logo.• Aditi would ask the operator to submit the details of the Transaction Certificate (TC) issued by the previous CB for the current/previous production year/s for verification and mass balance of previously certified crops/products. Closing stock details including balance quantities of certified products available on Tracenet would have to be produced during application for certification continuation.• If a scope of certification is reduced, the certification body shall take actions specified by the certification scheme and shall make all necessary modifications to formal certification documents, public information, authorizations for use of marks, etc., in order to ensure the reduced scope of certification is clearly communicated to the client and clearly specified in certification documentation and public information.• For operators in India and outside India as per EU for transfer of certificate includes ;<ol style="list-style-type: none">a) In cases where ADITI is the receiving control body, it will request from the previous CB and will assess the following information: the status and validity of certification, including cases of scope reduction, suspension and withdrawal; reports of inspections carried out in the preceding 3 years; derogations granted or requests for derogation being



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	<p>processed by the previous control body; information relating to any ongoing dispute relevant for the certification of the operators or groups of operators.</p> <p>b) In cases where ADITI is the receiving control body and the previous control body does not transmit the required information or in case of doubts concerning the information transmitted, it will not issue certificate to the transferring operators or groups of operators until it has eliminated any doubts by other means of control.</p> <p>c) 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. Where ADITI is the sending CB, the policy does not have provisions that CB shall, within 30 days, provide to the new control body the control file of the transferring operator or group of operators, the inspection records, the status of the certification, the list of non-compliances and the corresponding measures taken by ADITI.</p>
6	Reducing the organic status (Sanctioning), suspending or withdrawal or cancellation of certificates
6.1	Criteria
	<p>The Authorised Certification Manager, on behalf of ADITI, shall initiate a compliance action against a certified client who violates the Act or standard regulations.</p> <p>The reasons of reducing/downgrading the organic status (Specific to farmer) through sanctions, suspending a certificate and eventual cancellation of certificate and revocation of contract are actions as a result of the following (examples):</p> <ul style="list-style-type: none"> • It can be result of certificate committee reviews of inspection reports and findings raised by the Inspector. • Investigations initiated on recommendation of any other Certification Body/Accreditation Body or State Governing Authority or others where there is a doubt of breach of organic integrity. • Withdrawal from a certification program can also be initiated from the Client voluntarily stating the reasons.
6.2	Standard Specific Requirements for Reducing the organic status (Sanctioning), suspending or withdrawal or cancellation of certificates
	<p>1) NPOP</p> <p>4.4.5 Withdrawal of certification: Where an infringement that affects the organic integrity is found, the accredited Certification Body shall ensure that the non-compliant lot of production is removed from the entire lot of the production cycle which is affected by the infringement concerned. 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.</p> <p>4.2.11 Documentation & Document Control</p> <p>A documented statement of its certification program including the policies and procedures for the grant, maintenance, extension, suspension and withdrawal of certification.</p> <p>4.4.6.4 Marks and Certificates</p> <p>The accredited Certification Bodies shall have documented procedures for withdrawal and cancellation of contracts, certificates and certification marks.</p>



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Procedure to be followed for re-certification of terminated Operators under NPOP is as below:

1. Terminated Operators may apply for fresh registration to the same or another Certification Body (CB) along with full disclosure of past sanctions including termination and period of termination (as applicable).
2. Certification Body to take note of past sanctions and verify the same from the Certification Body who had imposed the sanction on the operator and also seek details of the non-compliances and decision on sanction.
3. The Certification Body of the sanctioned operator shall provide all the relevant details to the new Certification Body within a period of 14 working days from the date of receipt of correspondence.
4. The Certification Body must ensure that the required period of sanction (if applicable) has been completed before certifying a terminated operator. Where termination period has not been specified in the sanction, a minimum period of two years shall be completed before the operator is again certified.
5. The Certification body must ensure due diligence while certifying such cases and ensure thorough verification & onsite audits that past concerns have been duly addressed.
6. Subsequent to that, the Executive Head of the Certification Body will send a request letter on their letterhead to NPOP Secretariat (APEDA) that they have verified the compliance of the operator and are willing to register and certify the said Operator.
7. Thereafter, the NPOP Secretariat (APEDA) will examine the request received from the Certification Body for allowing the operator for fresh registration.
8. The Certification Body will be intimated accordingly.

2) NOP

(2.1) §205.405 Denial of certification.

(a) When the certifying agent has reason to believe, based on a review of the information specified in §205.402 or §205.404, that an applicant for certification is not able to comply or is not in compliance with the requirements of this part, the certifying agent must provide a written notification of noncompliance to the applicant. When correction of a noncompliance is not possible, a notification of noncompliance and a notification of denial of certification may be combined in one notification.

(c) After issuance of a notification of noncompliance, the certifying agent must:

(1) Evaluate the applicant's corrective actions taken and supporting documentation submitted or the written rebuttal, conduct an on-site inspection if necessary, and

(i) When the corrective action or rebuttal is sufficient for the applicant to qualify for certification, issue the applicant an approval of certification pursuant to §205.404; or

(ii) When the corrective action or rebuttal is not sufficient for the applicant to qualify for certification, issue the applicant a written notice of denial of certification.

(2) Issue a written notice of denial of certification to an applicant who fails to respond to the notification of noncompliance.



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(2.2) §205.662 Noncompliance procedure for certified operations.

(a) Notification. When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation. Such notification shall provide:

- (1) A description of each noncompliance.
- (2) The facts upon which the notification of noncompliance is based; and
- (3) The date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.

(b) Resolution. When a certified operation demonstrates that each noncompliance has been resolved, the certifying agent or the State organic program's governing State official, as applicable, shall send the certified operation a written notification of noncompliance resolution.

(c) Proposed suspension or revocation. When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent or State organic program's governing State official shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the non-compliance. When correction of a noncompliance is not possible, the notification of noncompliance and the proposed suspension or revocation of certification may be combined in one notification. The notification of proposed suspension or revocation of certification shall state:

- (1) The reasons for the proposed suspension or revocation;
- (2) The proposed effective date of such suspension or revocation;
- (3) The impact of a suspension or revocation on future eligibility for certification; and
- (4) The right to request mediation pursuant to §205.663 or to file an appeal pursuant to §205.681.

(d) Wilful violations. Notwithstanding paragraph (a) of this section, if a certifying agent or State organic program's governing State official has reason to believe that a certified operation has wilfully violated the Act or regulations in this part, the certifying agent or State organic program's governing State official shall send the certified operation a notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance.

(e) Suspension or revocation. (1) If the certified operation fails to correct the noncompliance, to resolve the issue through rebuttal or mediation, or to file an appeal of the proposed suspension or revocation of certification, the certifying agent or State organic program's governing State official shall send the certified operation a written notification of suspension or revocation.

(2) A certifying agent or State organic program's governing State official must not send a notification of suspension or revocation to a certified operation that has requested mediation pursuant to §205.663 or filed an appeal pursuant to §205.681, while final resolution of either is pending.

(f) Eligibility. (1) A certified operation whose certification has been suspended under this section may at any time, unless otherwise stated in the notification of suspension, submit a request to the Secretary for reinstatement of its certification. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective actions taken to comply with and



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remain in compliance with the Act and the regulations in this part.

(2) A certified operation or a person responsibly connected with an operation whose certification has been revoked will be ineligible to receive certification for a period of 5 years following the date of such revocation, Except, That, the Secretary may, when in the best interest of the certification program, reduce or eliminate the period of ineligibility.

3) COR, Part 13 SFCR SUBDIVISION C Suspension and Cancellation

C.2.4 Certification decision

C.2.4.1 If a CB has reason to believe that an applicant for initial certification has wilfully made a false statement regarding its production system and operations related to the products included in the application, the CB may deny certification, without issuing a notification of noncompliance.

C.2.4.2 The CB shall issue a written notice of denial of certification to any applicant to whom it denies certification, either because operations resulting in the products included in the application are still non-compliant with requirements or simply because the applicant did not respond to the notification of noncompliance. This notice shall state the reason(s) for denial and the applicant's right to:

- file an appeal of the denial with the CB.
- reapply for certification to any accredited CB, including the one who denied certification.

Certificates shall be issued as per the below formats.

- COS Organic certificate (F 4.8.7)
- COS Packaging and Labelling Certificate (F 4.8.7.1)
- Attestation of compliance as per COR (F 4.8.12_)

The Organic Product Certificate will only be issued once the organic product meets the requirements of Canadian organic standards. In the case of first-time applicants, if no organic product is available, the CB can issue a letter confirming that the applicant has an organic system plan in place for organic products as specified in the organic system plan. The letter must contain the following wording "This letter cannot be used for marketing organic products".

C.2.8 Suspension, cancellation, and reinstatement

C.2.8.1 The CB shall suspend and cancel a certification as per part 13 of the SFCR.

C.2.8.2 The CB shall report to its CVB all suspensions, changes 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.

C.2.8.3 The CB shall not grant certification to an applicant who had its certification previously cancelled and whose name appears on the CFIA published list of cancelled organic certifications unless the applicant has submitted an application for certification to a CFIA accredited CB as per section C.2 and has completed the evaluation process and closed all the non-conformities.

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

C.2.8.5 The CB shall proceed with granting a certification after receiving confirmation from the CFIA that the operator is removed from the CFIA list.

C.2.8.6 The Organic Production Systems: General Principles and Management Standards



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(CAN/CGSB-32.310) require that the Standard be fully applied on a production unit at least 12 months before the harvested product is considered organic for these food commodities (per 5.1.1 and 7.2.8). These 12 months must be under the oversight of a CFIA accredited certification body (CB).

C.2.8.7 A cancelled operator who wishes to be reinstated must apply as a new applicant. For food commodities that require an application to be filed 15 months before the day on which the food commodity is expected to be sold, CFIA interprets the requirements as follows:

C.2.8.7.1 The production unit (the applicant) must be under CB oversight for at least 12 consecutive months prior to the harvest of a product in order for it to be covered by the organic certificate (issued by the CB at the end of the 12 months).

C.2.8.7.2 Products harvested by the applicant during or prior to the start of the 12 months of oversight are conventional and cannot be marketed as organic.

C.2.8.7.3 For the requirements of the standard to be met, the oversight is based on the time of harvest, and not the expected time of sale.

C.11.2.3 The CFIA-accredited CBs shall:

C.11.2.3.1 issue an "attestation of compliance" using the template included in Appendix 1 of the COR Operating Manual, which will be valid for 12 months beginning on the day on which it is granted

C.11.2.3.2 suspend or cancel an "attestation of compliance" as required according to C.2.8

C.12.7 Suspension and cancellation

C.12.7.1 The CB shall hold the grower group responsible for compliance of all members.

C.12.7.2 The CB shall have a documented suspension policy in the event of noncompliance by the grower group or a member.

C.12.7.3 The CB shall suspend or cancel the certification granted to the grower group as a whole, in accordance with part 13 of the SFCR, in cases where the grower group's internal control system fails to act on these non-compliances.

Appendix D: CB management of nonconformities and enforcement actions under the Canada Organic Regime.

4) EU Regulation 2021/1378 Art 1

The Control Body need to be recognised as per EU 2018/848 Art 46 (1) for providing scope certificate to the operators or Group of Operators in third countries. Also verified the compliance and control as per point (b)(i) of Article 45(1).

The decision will be made by the certification committee and in case of any critical issue, the management will be involved for the approval of the decision.

The certificate shall:

- (a) Be issued in electronic form, in accordance with the model set out in Annex I to this Regulation, and by using the electronic Trade Control and Expert System (TRACES) referred to in point (36) of Article 2 of Commission Implementing Regulation (EU) 2019/1715(2).
- (b) Allow the identification of:
 - i. The operator, group of operators or exporter covered by the certificate, including the list of members of a group of operators.
 - ii. The category of products covered by the certificate, classified in the same way as provided for in Article 35(7) of Regulation (EU) 2018/848; and



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	<p>iii. Its period of validity.</p> <p>(c) Certify that the activity of the operator, group of operators or exporter complies with Regulation (EU) 2018/848; and</p> <p>(d) Be updated whenever changes occur concerning the data included in it.</p>
6.3	Denial, Reducing, Suspending, Withdrawal/surrender and cancellation of a Certificate/attestation of compliance
	<p>6.3.1 Denial of certification</p> <p>The initial application for certification may be denied with comments in the Application for Organic certification (Section-For office use only) when Aditi finds cases where the certification requirements have not been clearly defined or there are any differences between the applicant and ADITI about the certification procedure which is not clear or if ADITI finds out that certain information has been stated falsely and deliberately.</p> <ul style="list-style-type: none">• For the first year of certification, ADITI shall issue a notice of denial of certification if the NC closure has not been addressed/if corrective actions have not been implemented so as to confirm compliance, or if there has not been any response from the client for the NC communication/email notifications. The notice will comprise of reason of denial and also the provision for an appeal challenging the denial. It also states that the client can re-apply for certification to other CBs or to ADITI.• A written notification of noncompliance will be sent by the Certification Manager of ADITI to a certified client when an inspection, review, or investigation of such project reveals any noncompliance with the standards/ regulations. <p>6.3.2 Reducing, suspending or withdrawal/surrender and cancellation.</p> <p>1) A notification of noncompliance if responded by the Client.</p> <ul style="list-style-type: none">• A notification of NC is sent by the evaluator within 30 days of receipt of the inspection report and will provide a description of noncompliance found and the facts upon which the notification is based. Additionally, the notification will provide the date by which the Certified client must rebut or correct each noncompliance described and submit supporting documentation of each correction (non-compliances to be addressed and closed by the client within 30 days of receipt of notification, extension is given on case-to-case basis).a) Resolved NC: Based on review of supporting documents received and after adequate compliance checks by the evaluator and the certification committee, the Certification Manager will send the client a written notification of noncompliance closure, usually this is combined with the certification report and certificate. Resolved NC leads to a certification decision and issuance of certificate or lifts a suspension on an existing organic client.b) Unresolved NC: If a noncompliance is not resolved by correction and the operator requests more time for resolving the same, a extension is given to address the NC. Certification manager re-assesses the NC to determine closure. If the NC still remains open, the Certification Manager will issue a notification of proposed reduction in status (sanctioning a farmer's organic status to in-conversion) or a letter of suspension of a Certificate.



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2) A notification of noncompliance if not responded by Client.

- If a notification of non-compliance is not responded by the client within 30 days, a notification of suspension is issued.
- The notification will state whether the suspension will be for the certified client's entire certification, the certification applicable to an entire field/unit, or a specific area of certification or for a particular farmer in case of group farming projects. For instance, if a Certified Client with field activities in different geographic areas is cited for a compliance violation at one field, the Certification Manager could determine that only that portion of the certification applicable to the noncompliant field/unit should be suspended. In case of a particular farmer in a Group farming project is found is be not conforming with the organic regulations and based on Inspection findings, the certification committee can sanction or delete that particular farmer with a notice.

3) A notification of reduction in status or suspension is responded by Client.

- The above notification as a result of certification committee decision on a raised Non-Compliance, will state the reasons and allow client 30 days to take corrective action. If ADITI is satisfied that the Client has resolved the issues that were grounds for suspension within the time allowed, the CVB is informed regarding the continuation of certification and the certificate is continued. If the provided response is not satisfactory, the Certification Manager notifies the operator regarding the suspension and the date on which it takes effect.

4) A notification of reduction in status or suspension is not responded by client within 30 days, the suspension shall hold good and will lead to the cancellation of certificate.

5) A notification of cancellation and provision of appeal

- ADITI notifies the operator of the grounds for cancellation and provide the operator an opportunity to be heard if the notification of suspension sent to a operator, is not responded upon or if no adequate response is provided.
- Any dispute with respect to cancellation of certification or suspension of certification under this part may be mediated at the request by the applicant in writing for certification or certified operation and with acceptance by ADITI. The right of acceptance for a mediation lies with ADITI and if mediation is rejected, the client will have the right to appeal within 30 days of the date of the written notification of- rejection of the request for mediation.
- If mediation is accepted by ADITI, such mediation shall be conducted by a qualified mediator mutually agreed upon by the parties to the mediation. The parties to the mediation shall have no more than 30 days to reach an agreement following a mediation session.
- The Certified Client may file an appeal to the Certification Manager's determination. If the Certified Client fails to file an appeal of the proposed reduction in status within 30 days of notification of suspension or cancellation, the Certification Manager will suspend or cancel the Certified client 's certification which is also termination of certification contract with ADITI.
- A Certified Client whose certification is suspended or cancelled must cease all certification activities in each area of certification and in each State for which its certification is suspended or cancelled.
- Any Certified Client whose certification has been suspended or cancelled must transfer to ADITI all records concerning its certification activities that were suspended or cancelled. The Certified Client must also make such records available to any applicable Accreditation body or



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	governing State official. The records will be used to determine whether all other operations under certification of the certified client may retain their organic certification.	
7	Related Documents	<ul style="list-style-type: none">• 3.2.1: Application of Organic certification.• Copy of NOC• Details of labels approved by previous CB Details of TCs issued by previous CB.
8	Access to this policy	<ul style="list-style-type: none">• This policy is available to all interested public• It must be handed out to all ADITI certification and inspection personnel

Revision history:

Revision date	Version	Description of Changes
14/09/2020	02	<ul style="list-style-type: none">• Normative Framework, Terms, Related Documents-section has been modified as per relevant standards.• WI 4.2.13: Recognition of Certificate issued by other Certification Bodies Inspection and certification report and list of non-conformities is being achieved and related sections are merged in the present Policy.
25/11/2022	03	<ul style="list-style-type: none">• Updated as per EU 848/2018 regulation
29/05/2023	04	<ul style="list-style-type: none">• Updated the required documents need to be collected at the time of NOC-In.
22/12/2023	05	<ul style="list-style-type: none">• Updated the COS changes as per the version 19 in the section C.10.1.2