Policy on information transfer, exchange and disclosure

1	**Aim**
	This policy aims to obtain the maximum transparency in certification processes for all involved parties, without affecting the necessary principles of confidentiality.
2	**Background**
	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 an effective manner to both inspectors and clients. Staff and clients are updated regularly concerning changes in regulation, ADITI policies and procedures. 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.
3	**Normative framework (Jump to the EU normative references here; jump to main policy here).**
	3.1 ISO/IEC 17065:2012 **4.6 Publicly available information** The certification body shall maintain (through publications, electronic media or other means), and make available upon request, the following: 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. 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. 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 d) information about procedures for handling complaints and appeals **(Annex A): A.4 Confidentiality and openness** A.4.3 Openness 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. A.4.4 Access to information 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. **3.2 NPOP-CHAPTER 4** **4.2.19 Public Information** (i) The Certification Bodies shall actively inform the public of the scope of its certification and its accreditation status. (ii)The Certification Bodies shall ensure disclosure of the following: A. Standards and a general description of the Certification Bodies; B. Updated list of its certified Operators and details of farmers under the Grower Group, including,

a. Name of farmer(s) in full, with father's/ husband's name,

b. Addresses with pin code (location),

c. Crop grown and/or product details, as applicable,

d. Farm location,

e. Details of farm holding(s),

f. Organic status,

g. Other details and information as may be specified from time to time. etc.

C. Such information shall be updated from time to time at regular intervals and shall be made available in public domain and published on respective Certification Body's website and with respect to the Grower Groups also at their ICS office. The information should be readily accessible to the concerned stakeholders, Government (Central/State) Agencies for their schemes related to organic production and for verification purposes etc.

(iii). APEDA-NPOP Secretariat may seek such information from time to time based on regulatory requirements for ensuring transparency and credibility of the organic certification system.

4.2.5 Quality Management system (QMS) (iv)o. 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.

4.9.2 Withdrawal of certification

In case of any violation by the operator, the Certification Body shall withdraw certification from the operator for a specified period in case serious non compliances affecting the organic integrity are observed. In case of severe infringement or repeated violations of the NPOP norms, the certification of the Operator shall be terminated and the Certification Body shall inform about their decision to APEDA and shall also publish the same on their website.

4.4.9 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.

4.3.5. Accreditation contract

ii. The Certification Body shall also submit the tariff structure leviable on Operators to APEDA annually or in case of any change for various activities and shall also display it prominently on their website and office site.

5.18.3 External Inspection

(iv) A list of all Grower Groups that have been sanctioned under the NPOP shall be published on the website of the Certification Body

NPOP Procedure 2024

CHAPTER 1 ACCREDITATION PROCEDURE: 8. Accreditation contract

(ii) The Certification Body shall also submit the tariff structure within the limit as stipulated from time to time, leviable on operators, to APEDA annually by the 31st day of January, or, in case of any change, for various activities, within 30 days from such change, and shall also display it prominently on their website and at their office.

CHAPTER II OVERSEAS ACCREDITATION (Procedure for application):

3. The applicant CB shall submit their fee structure applicable to overseas operators based on scopes, which shall also be displayed on their websites.

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

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.

B.7.9 The CB has 15 days after the day the accreditation was suspended to submit their list of operators as per subsection 364(5) of the SFCR.

B.7.10 The CB has 30 days after the day the accreditation was suspended to take corrective action as per paragraph 365(1)(a) of the SFCR.

B.7.11 The CB shall submit their corrective action to the CVB for review and assessment. The CVB shall determine the acceptability of the corrective action plan within 10 working days.

B.12.1 Requirements on CB

- B.12.1.1 The CB shall submit an application form to another designated CVB and notify the current CVB of the decision to change
- B.12.1.2 The CB shall provide all supporting documents as requested by the receiving CVB
- B.12.1.3 The CB shall pay the application fees determined by the receiving CVB
- B.12.1.4 The CB shall cease use of the previous Accreditation letter.

B.13.1 Requirements on CB

- B.13.1.1 The CB shall send a written notice to the CVB that monitors the CB activities under COR
- B.13.1.2 The CB shall submit to the CVB the list of holders of certifications and a list of pending applications for certification as per sub section 364(5) from part 13 of the SFCR
- B.13.1.3 The CB shall notify the holders of certifications within 3 months after the CB has sent the written notice to the CVB to give them sufficient time to find another certification body
- B.13.1.4 The CB shall surrender the CFIA accreditation letter before it expires

B.14.1 Requirements on CB

- B.14.1.1 The CB shall notify immediately its CVB in cases where it plans to stop certifying organic products or it may become unable to continue to certify organic products.
- B.14.1.2 The CB shall provide to the CVB the list of holders of certifications and the list of pending applications for certification as per subsection 364(5) of part 13 of the SFCR.
- B.14.1.3 The CB shall not accept new applications for certification during this period of financial uncertainty but shall make every effort to complete the certification process of the existing applicants.

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 with Bio Suisse Residues & Pest management -Procedures for residues).

3.5 IndG.A.P.

3.5.1Publicly 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 2018/848 and it's delegated & implementing acts

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

- 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 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).

(EU) 2021/1698 Article 19 Information requirements

Article 19.1 After its recognition, the control authority or control body shall notify the Commission in due time, and not later than within 30 calendar days, of the occurrence of changes to the content of its technical dossier.

Article 19.2 The control authority or control body shall keep available and communicate at the request of the Commission or the competent authorities of the Member States all information related to its control activities in the third country.

(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 20.3 Where a document or procedure provided for in Article 46 of Regulation (EU) 2018/848 or in the delegated and implementing acts adopted pursuant to that Article requires the signature of an authorised person or the approval by a person at one or more of the stages of that procedure, the computer systems set up for the communication of those documents shall make it possible to identify each person and guarantee that the integrity of the content of the documents, including as regards the stages of the procedure, cannot be altered, in accordance with Union law, and in particular with Commission Decision 2004/563/EC, Euratom ([5]).

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 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 and/or their subcontractors change their control body, the new control body shall request the control file of the operator 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 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. The new control body shall ensure that non-compliances noted in the report of the previous control body have been addressed by the operators. 6. Where 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.
4	**Terms:** 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. Here, Aditi is the control body.
5	**Policy**
	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: • Parts of this Quality Manual, • Lists of all certified operators updated monthly, • All relevant information relating to our Certification System includes information about the certification process, fees and many more. 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/mails/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). 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 an integral part of the standard's requirements to inform the applicant about the certification procedure and the standard itself. ADITI notifies without any delay its accreditation body regarding any irregularity or infringements of its registered operator or the products ADITI certifies. Aditi will constantly ensure that information on the website is updated by: Reviewing, & updating it monthly Updating immediately (within 2 working days), if there is any change of the status of the certification. In case of withdrawal, information relating to the certificates, in particular, the certificate number, category of products covered by the certification, status and validity of certification, including cases of scope reduction, suspension and withdrawal as referred to in ISO standard ISO/IEC 17065;) shall be kept in the list for 5 years after the withdrawal along with the procedure.
5.1	**Keeping staff informed:** • ADITI will provide inspectors and other interested staff copies of all relevant regulations and relevant parts of the Quality Manual • 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. • ADITI management and headquarter staff meets at least once per month, among others to exchange all relevant information.
5.2	**Staff participation in decisions:** 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 take into account the criteria expressed by the staff.
5.3	**Keeping clients informed:** • 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. • 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. • All ADITI staff will give clients or other interested public satisfying information upon requests concerning standards, policies, or procedures. • Inspectors or other local ADITI representatives are responsible for informing all local clients immediately about relevant changes in regulations, policies, or procedures. The following kind of documents will always have to be provided in a locally understandable language: - Organic Management Plans

	- Brief information - ADITI Policies - Contracts 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.
5.4	**Keeping Accreditation Bodies (AB's)/Conformity Verification Bodies (CVB's) informed:** • ADITI will provide data related to the certified clients along with details of certification decisions (Suspension/Cancellation/Withdrawal) in a timely manner. • Any data deemed necessary shall be provided to the ABs/CVBs within the stipulated time. • Any incidents affecting the organic integrity of the product shall be notified on priority. • All serious violations, sanctions, positive residue analyses, complaints, grievances, or charges filed by third parties, as well as media reports concerning operations including name changes — must be reported to ICB AG promptly, and no later than five business days, specifying the resulting impact on the EU organic (or equivalent) certification decision. • ADITI will inform Naturland certification committee about any unannounced inspection /random sample inspections (e.g. farms, inspection date, sampling, etc.) or any kind of violations as early as possible (within 3 weeks of the inspection). • Any changes to the certification status of the client are uploaded on the website immediately. In case of CVB, as per COR following will be followed: • ADITI will submit the list of certified and pending operators to the CVB within 15 days of suspension, as per subsection 364(5) of the SFCR. ADITI will take corrective actions within 30 days of suspension, as per paragraph 365(1)(a), and submit the corrective action plan to the CVB for review. The CVB will assess the plan within 10 working days. • ADITI will submit an application to the newly designated CVB and notify the current CVB when changing CVB. ADITI will provide all required documents, pay the application fee to the new CVB, and discontinue the use of the previous accreditation letter. • In the case of voluntary withdrawal, ADITI will send written notice to the CVB, submit lists of certified and pending operators (as per subsection 364(5)), notify all certified operators within 3 months of the notice, and surrender the CFIA accreditation letter before expiry. • If ADITI plans to stop certification or becomes unable to continue certifying organic products, it will immediately notify the CVB, submit the operator lists, and refrain from accepting new applications during the period of financial uncertainty, while ensuring completion of pending certifications to the extent possible.
5.5	**Keeping Peers informed** • Incidences of frauds and any information required to assist investigation of any residue identified shall be shared with other Certification bodies.
5.6	**Keeping the subcontractor informed** • ADITI will provide data related to the Subcontractor's requirement as well and as per the requirement mentioned in section 3 of this document. • 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.

	• In the case of subcontracted laboratories, only sampling forms containing Operator 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.
5.7	**Information transfer in the OFIS portal** • ADITI will provide data related to the OFIS cases requirement as well and as per the requirement mentioned in section 3 of this document. • ADITI will keep regular check on OFIS portal for the collect any information from the commission. • ADITI will provide the required information on OFIS portal within 30days of receiving requirement along with all relevant documents from the concerned bodies. Detailed policy on information exchange for EU (it should be read along with the general policy as in 5.1- 5.6): **Annual report** By 28 February every year, Aditi shall submit an annual report to the Commission. That annual report shall set out the activities of Aditi in the previous year in accordance annex to this document and as per annex II of EU 2021/1698. It shall be submitted in the English. **Immediate Information Sharing on Non-Compliance** • **Action:** Upon suspicion or detection of non-compliance that may affect the integrity of organic products, Aditi must immediately share the information with other control authorities, control bodies, and the Commission. • **Method:** Information must be shared via the OFIS platform. **Notification of Changes** • **Action:** Aditi must notify the Commission of any changes to its technical dossier within 30 calendar days of the occurrence. • **Method:** Use the appropriate notification procedure as defined by the Commission. For example, via OFIS system. **Document Retention and Availability** • **Action:** Aditi shall maintain and provide, upon request, all relevant information regarding its control activities to the Commission or competent authorities of Member States. • **Method**: Documentation is secured and accessible manner for immediate retrieval when required. Microsoft 365 Business Standard and EDMS- Electronic Data Management Software is used for the purpose. **Use of OFIS for Information Exchange** • **Action:** Aditi shall use OFIS for all information exchanges with the Commission, other control authorities, and control bodies. • **Procedure:** Ensure all relevant staff are trained in using OFIS. This procedure in-lines the details for data entry. **Investigation and Reporting of Non-Compliance** • **Action:** Upon receiving a notification of suspected non-compliance from the Commission, Aditi shall conduct an investigation and report the findings within 30 calendar days. • **Method:** Complete the investigation using the template in Annex III of Regulation (EU) 2021/1698 and submit the report via OFIS. **5.6 Exchange of Control Files**

	• **Action:** When an operator changes control bodies, Aditi shall request the operator's control file from the previous control body and ensure all non-compliances are addressed. • **Timeline:** The previous control body must provide the control file within 30 days. • **Verification:** Aditi shall review the control file to confirm that all previous non-compliances have been resolved before certifying the operator. **5.7 Traceability and Mass Balance Checks** • **Action:** For operators subject to traceability and mass balance checks, Aditi shall exchange relevant information with other control bodies to complete these checks. • **Coordination:** Ensure that all necessary data is shared promptly to facilitate the finalization of checks. **5.8. Compliance and Review** • **Monitoring:** Regular audits will be conducted to ensure adherence to this policy. • **Review:** This policy will be reviewed annually or as required by changes in EU regulations.
NOTE	In alignment with Article 46 of Regulation (EU) 2018/848 and its related delegated and implementing acts, Aditi, as a control body, has adopted a secure digital documentation system that ensures traceability and accountability at every procedural stage. This system guarantees that any document requiring the signature or approval of an authorized person is managed in a way that allows for clear identification of all involved individuals. Furthermore, it preserves the integrity of document content and procedural records, preventing unauthorized alterations in compliance with Union law—specifically adhering to the principles outlined in Commission Decision 2004/563/EC, Euratom. Aditi has a document system with Clear Identification of each authorized person involved at every approval stage in procedures and in formats used to implement these procedures. Document Integrity: No part of the document or its process history (who signed what, when) can be altered after the fact. Various ways to ensure this is adopted by Aditi are: - eMudhra (e-sign) are used by Top Management, Transaction Certificate team lead (person signing the TCs), and Certifiers. - Adobe e-signatures can be used by the entire team from their computer system to sign these documents. - In some cases, where e-signature is not possible, for example, where client's (farmer's) signature is needed, Aditi uses the hard copies, and both the inspector(s) & client sign it. The original copies are kept in hard files, while the soft copies are held in the scanned folders. - All such signatures have a date in it. - Each stage of certification approval (Inspector → Reviewer → Approver, etc.) is recorded, signed, and locked. - The documents (client files) are stored on share-point, which allows us to verify all versions (auto generated) and to keep track of when the document was signed by whom. - These systems are auditable and data protection compliant. Further to this, ADITI retains all records to demonstrate that certification process requirements have been effectively fulfilled. Within this system, all inspection and certification records are filed for the minimum period of 5 years in the "active folder". Records older than 5 years may be stored in the archive for the remaining period (for at least additional 5 years from the date it was saved in the archive). The archive is only accessible for ADITI staff members. Hence all records are kept with Aditi for at least 10 years.
6	**Annex (EU)**

Requirements for the annual report:

1. All the content of technical dossier shall be updated in the annual report
2. It shall include the name and code number of the Aditi, mailing address, telephone number, email contact point and website address including a direct link, with an easy access from the home webpage, to the up-to-date list of operators.

Following information is updated in the technical dossier:

(a) the control activities in the previous year, per category of products;

(b) an undertaking that Aditi has performed the required updates of the translation of the production rules;

(c) any update of the internal procedures, including the certification and control system;

(d) a link to the website of Aditi, with the information required on client-database;

(e) an annual assessment report of the office(s) where certification decisions are taken;

(i) report/ verification records from accreditation body

(ii) proof that Aditi still has the capacity and the competencies to implement the control requirements, conditions and measures set out in Article 46(2) and (6) of Regulation (EU) 2018/848 and in this Regulation, in each country of operation;

(iii) including any updated information of the annual assessment report as regards the results and an evaluation of:

- the checks of the files of the operators or groups of operators;
- the list of non-compliances, as well as the number of non-compliances in relation to the number of certified operators or groups of operators;
- the handling of non-compliances and complaints, if any, with an explanation on the corrective measures implemented by the operators or groups of operators for the lasting closure of its non-compliances;
- the catalogue of measures and its implementation;
- the risk analysis procedure;
- the annual risk plan;
- the sampling strategy, procedure and methodology;
- the changes to any of the procedures;
- the exchange of information with other control authorities, control bodies and the Commission;
- the competence of the staff involved in the inspection and certification process;
- the training programmes;
- the knowledge and competence of new staff;
- the effectiveness and reliability of the activity witnessed and an overall assessment of the performance of the control authority or control body;
- other elements that the accreditation body or competent authority considers relevant for the purposes of Regulation (EU) 2018/848;

(iv) If there has been an extension of the scope of recognition to additional third countries or categories of products in the previous year, the capacity and competencies of Aditi to perform controls in accordance with this Regulation in each new third country or for each new category of products concerned, if there are active operators or groups of operators.

4. The annual report shall include the following information with regard to cases of non-compliance and the measures taken:

(a)the number of physical on-the-spot inspections with and without prior notice;
(b) the number of the samples collected in inspections with and without prior notice and where applicable, the actions taken;
(c) the number of samples collected due to suspicion, complaints or during an investigation as referred to point (a) of Article 22(1) notified through OFIS as referred to in Article 21(2) (OFIS case);
(d) the number of OFIS cases of suspected or established non-compliance;
(e) the number of non-compliances found, broken down into minor, major and critical according to the classifications of non-compliances of organic or in-conversion products;
(f) measures taken in respect of operators in cases of non-compliances.

5. In case of transfer of certificate, the annual report of Aditi shall indicate for each transferred operator or group of operators:
(a) the name of the operator or group of operators, its geographical location and its previous certificate number;
(b) the name of its previous control authority or control body;
(c) the date of transfer of the control file;
(d) the list and nature of open non-compliances and measures required by the previous control authority or control body, if any;
(e) the measures put in place by the operator or group of operators to ensure that the non-compliances will not occur again, and the date(s) of the inspection(s) carried out by the new control authority or control body to verify that corrective measures have been correctly implemented;
(f) the indication whether the operator or group of operators was involved in any OFIS case.

6. Concerning high-risk products, the following information shall be provided:
(a) the list of the operators or groups of operators responsible for the high-risk products;
(b) for each operator or group of operators:
(i) the inspections carried out, indicating the date of each inspection;
(ii) the sampling and analyses carried out;
(iii) non-compliances found;
(iv) the measures applied;
(v) in case of transfer of certificate, the corrective measures and/or sanctions applied if non-compliances were noted in the report of the previous control authority or control body;

(c) for each consignment showing a non-compliance:
(i) reference to the certificate of inspection for imported consignments;
(ii) overview of sampling analysis results that indicate the presence of residues of non-authorised substances;

(iii) investigations and follow-up measures taken by Aditi in case of commingling or residues of non-authorised substances found in the consignment, including the decision concerning the consignment as well as confirmation that operators have taken corrective measures.

7. For derogations granted in accordance with points 1.3.4.3 and 1.3.4.4 of Part II of Annex II to Regulation (EU) 2018/848 for each non-organic livestock species (bovine, equine, ovine, caprine, porcine and cervine animals, rabbits, poultry), the following information shall be provided:
(a) scientific and common name (common and Latin name i.e. species and genus);

(b) breeds and strains;

(c) production purposes: meat, milk, eggs, dual purpose or breeding;

(d) number of derogations and total number of animals derogated;

(e) number of operators, which have been granted a derogation.

7	**Access to this policy** • This policy is available to all interested public • It must be handed out to all ADITI certification and inspection personnel
8	**Related documents:** • INF-3.2.0 Brief Information for the clients on respective certification scope • CON-7.2.3 Client's Declaration on information Disclosure
	NOTE: At many places in this policies, we have copied/ used the language of EU Commission regulations as such, hence we haven't removed the term 'group of operator' from it, instead either we have strike through it or left it as such. Please note, as we have not applied for recognition of Group, requirements related to the operator will be applied to our operation and not for the group of operator after getting the recognition by EU COM.
9	**Revision History:**

Revision date	Version	Description of Changes
07/10/2020	02	• Normative Framework section has been modified as per relevant standards. • Updated ADITI logo with ® mark
25/11/2020	03	• The sections 5.4 and 5.5 have been included. • Normative references have been updated as per BioSuisse.
09/11/2022	04	• Normative framework has been updated as per the EU 2018/848 requirements.
19/12/2022	05	• Normative Framework has been updated with 848 and 1698 regulation of EU. • Section 5.6 has been added for the subcontracted bodies. • Section 5.7 has been added for the OFIS portal exchange of information
09/01/2023	06	• Update requirements as per EU.
16/03/2023	07	• Updated as per IndG.A.P.
16/06/2023	08	• Updated as per IndG.A.P.
09/11/2023	09	• Updated as per IndGAP requirements and closures.
09/03/2023	10	• Updated as per EU requirements
02/09/2024	11	• Updated as per Commission Regulation (EU) 2018/848 and it's delegated acts
03/06/2025	12	• Updated section 3 as per Commission Regulation (EU) 2018/848 and it's delegated acts, NPOP 8th edition, COR requirements.