

Policy on Certificate Transference		Doc No.: Pol. 4.2.13.1
Rev. No.: 08	Rev. Date: 03/06/2025	Page 1 of 7

Policy on Certificate Transference

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	<p>NPOP</p> <p>Chapter 4 Accreditation of Certification Bodies</p> <p>4.4.8 Shifting of Operators:</p> <p>i. 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 application for NOC shall be made at least 45 days before the expiry of scope certificate. At the time of filing NOC application, the Operator shall ensure that it has cleared all dues of the existing Certification Body and submitted the corrective action for the pending non compliances, if any.</p> <p>ii. The Certification Body shall issue the NOC within three weeks from date of filing of the application by the Operator subject to clearance of all dues and closure of pending non compliances on the part of the Operator, if any</p> <p>iii. The issuance of NOC will result in an online transfer of the operator file along with the reports to the subsequent Certification Body.</p> <p>iv. The Operator shall have a valid certificate during issuance of NOC and registration with new Certification Body.</p> <p>v. After expiry of the scope certificate, the Operator shall not be able to register with another Certification Body even after obtaining NOC.</p> <p>vi. The new Certification Body shall ensure that the non-conformities reported by the earlier Certification Body are closed before the issuance of the scope certificate.</p> <p>4.4.8.1 Shifting of farmers:</p> <p>i. The farmer(s) of a Grower Group may shift to another Grower Group under the same or another Certification Body if the farmer(s) does not want to continue with their existing Grower Group.</p> <p>ii. The farmer(s) belonging to a Grower Group can take No Objection Certificate (NOC) from the</p>

Policy on Certificate Transference		Doc No.: Pol. 4.2.13.1
Rev. No.: 08	Rev. Date: 03/06/2025	Page 2 of 7

Certification Body at the start of a new season for transfer to another Grower Group in the same geographical area or to form another Grower Group with other farmers in the same geographical area.

iii. In the above instances, the farmer(s) of the Grower Group who wants to shift shall place a request to the Certification Body for issuance of NOC on Tracenet. After receiving the request for NOC from farmer(s), the Certification Body shall verify the details of the applicant farmer(s) including past record, sanctions (if any), etc. from its ICS and dispose the NOC application within 30 days of receipt of such request.

iv. If the Certification Body does not dispose the NOC application of the applicant farmer within 30 days from the receipt of such application, such NOC application shall be automatically forwarded to APEDA, via Tracenet, and APEDA shall conduct the necessary verification and if satisfied, APEDA shall direct the concerned Certification Body to issue the NOC.

v. If the Certification Body rejects the NOC application of the applicant farmer, then the applicant farmer may file an appeal against such decision of the Certification Body before the NAB Sub Committee. The NAB Sub Committee shall conduct the necessary verification and if satisfied, APEDA shall direct the concerned Certification Body to issue the NOC.

vi. Any decision taken by APEDA herein shall be final and shall be complied with by the Certification Body within one week of the date of receipt of the same.

vii. Failure of the Certification Body to dispose of the NOC application within 30 days from the receipt of such application shall be considered a non-conformity under Regulation 6.1.4 of the NPOP.

viii. If the farmers are unable to operate the software themselves, the Certification Body shall facilitate the farmer to apply for NOC on Tracenet software, on charge of reasonable fee.

Advisory: Procedures for transfer of the Operators during Suspension/Termination of a Certification Body under NPOP

1. The operators of the suspended CB are required to apply for No Objection Certificate on Tracenet for transfer to another CB within 15 days.
 2. The new CB will forward the request to APEDA officially of their acceptance of the transferred projects within 7 days.
 3. 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
 4. The new CB will be able to register the operator (NOC No. provided by APEDA) after inspection (within one month)
 5. Resulting in 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)
 6. The process of transfer is given below for different types of operators. Resulting in 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)
- The process of transfer is given below for different types of operators.
 - In the 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

Policy on Certificate Transference		Doc No.: Pol. 4.2.13.1
Rev. No.: 08	Rev. Date: 03/06/2025	Page 3 of 7

	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 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</p>

Policy on Certificate Transference		Doc No.: Pol. 4.2.13.1
Rev. No.: 08	Rev. Date: 03/06/2025	Page 4 of 7

	<p>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 2018/848 regulations:</p> <p>DA 1698/2021</p> <p>Article 10. Checks for the certification of operators.</p> <p>3. Besides any other element that may be considered relevant by the control authority or control body, before certifying operators or groups of operators that were previously certified by another control authority or control body, the new control authority or control body shall assess the following information to be transmitted by the previous control authority or control body:</p> <p>(a) the status and validity of the certification, including cases of scope reduction, suspension and withdrawal as referred to in the International Organisation for Standardisation (ISO) standard ISO/IEC 17065.</p> <p>(b) reports of inspection carried out in the preceding 3 years.</p> <p>(c) the list of non-compliances and the measures put in place to address them, and the fact that all non-compliances were addressed.</p> <p>(d) derogations granted or requests for derogation being processed by the previous control authority or control body;</p> <p>(e) information relating to any ongoing dispute relevant for the certification of the operators or groups of operators</p> <p>If the previous control authority or control body does not transmit the information as required in Article 21(5) of this Regulation to the new control authority or control body or in case of doubts concerning the information transmitted, the new control authority or control body shall not issue the certificate referred to in point (b)(i) of Article 45(1) of Regulation (EU) 2018/848 to operators or groups of operators until this new control authority or control body has eliminated their doubts by other means of control.</p> <p>4. The control authority or control body shall not certify operators or groups of operators that have been withdrawn by their previous control authority or control body in the last 2 years unless the recognition of the previous control authority or control body has been withdrawn by the Commission in accordance with Article 46(2a) of Regulation (EU) 2018/848 for the specific third country and category of products.</p> <p>Article 21 Exchange of information between the Commission, control authorities, control bodies and competent authorities</p> <p>5. Where operators or groups of operators and/or their subcontractors change their control authority or control body, the new control authority or control body shall request the control file of the operator or group of operators concerned from the previous control authority or control body. The previous control authority or control body shall, within 30 days, provide to the new control authority or 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 authority or control body.</p> <p>The new control authority or control body shall ensure that non-compliances noted in the report of the previous control authority or 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>

4	Terms
	<p>NOC (No Objection Certificate): This is a document/certificate stating that the CB does not object to the transfer of the operator to a new CB. (As per NPOP, Standards).</p> <p>Letter of good standing: Letter from the Current CB confirming that all nonconformities (NCs) and any contract conditions have been addressed. (As per COR).</p>
5	Policy
	<ol style="list-style-type: none"> Aditi always makes sure: 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. EU/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. For EU, the certificate shall be valid when such request is received and before such operator is re-certified. Farmers details: When processing farmer wise NOC, the Certification Manager will ensure that the request was submitted before the new season begins, the proposed ICS is geographically proximate. Farmer's certification history, any sanctions, and, where available, the reason for NOC will be reviewed. The CB is accredited for the respective standard. This can be checked e.g. through the accreditation body'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). For EU 2018/848, check the status of the recognised certification bodies at Commission Implementing Regulation (EU) 2021/2325 amended by Commission Implementing Regulation (EU) 2025/883 of 14 May 2025. In order to transfer certified projects/farmers(s) to another CB, the operator has to apply for the No Objection Certificate (NOC) through Tracenet (within 45 days of scope expiry) or a Letter of Good Standing in case of COS. The request will be processed within 3 weeks for operators and within 30 days for farmers NOC 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 makes decisions on the basis of the 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 the 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 EU logo/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. Aditi does not entertain an application for Transfer of Certificate operators that have been withdrawn by their previous control authority or control body in the last 2 years unless the

Policy on Certificate Transference		Doc No.: Pol. 4.2.13.1
Rev. No.: 08	Rev. Date: 03/06/2025	Page 6 of 7

	<p>recognition of the previous control authority or control body has been withdrawn by their accreditation body(ies).</p> <p>Additional requirements for operators as per EU 2018/848 and it's delegated & implementing acts for transfer of certificate includes:</p> <ul style="list-style-type: none"> k) 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 processed by the previous control body; information relating to any ongoing dispute relevant for the certification of the operators or groups of operators. l) In cases where ADITI is the receiving control body and the previous control body does not transmit the required information or in case 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. m) 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. n) Where operators and/or their subcontractors change their certification body, Aditi shall request the control file of the operator concerned from the previous certification body. The previous certification body shall, within 30 days, provide to Aditi the control file of the operator or group of operators concerned, and the written records referred to in Article 14 of EU 2021/1698, the status of the certification, the list of non-compliances and the corresponding measures taken by the previous certification body. Aditi shall ensure that non-compliances noted in the report of the previous control authority or control body have been addressed by the operators or groups of operators. o) Where operators are subject to a traceability check and a mass balance check, certification body shall exchange the relevant information allowing finalization of these checks. p) When Aditi is the sending control body, it shall provide the control file of the transferring operator, including inspection records, certification status, list of non-compliances, and corresponding corrective measures, to the new control/certification body within 30 days of the request and the written records referred to in Article 14 of EU 2021/1698. Aditi will co-operate to provide any required information including, but not limited to, traceability and mass balance check. q) It is the responsibility of the operator to maintain the certification documents from it's previous certification body for at least the last five years. 	
6	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.
7	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:

Policy on Certificate Transference		Doc No.: Pol. 4.2.13.1
Rev. No.: 08	Rev. Date: 03/06/2025	Page 7 of 7

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 Commission Regulation (EU) 2018/848 and it's delegated acts.
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 version 19 in section C.10.1.2
28/02/2024	06	<ul style="list-style-type: none"> Policy updated as per EU TOC
11/09/2024	07	<ul style="list-style-type: none"> Updated as per Commission Regulation (EU) 2018/848 and its delegated acts
03/06/2025	08	<ul style="list-style-type: none"> Updated as per 8th Edition of NPOP Updated section 5 as per Commission Regulation (EU) 2018/848 and its delegated acts