1. ZENITH Steps to Organic Certification

Note : The official language of ZENITH is English. Applicant or operator wishing to do certification business in another language must provide English translation for personnel and documentation. Production record may be maintained in native language provided documentation must be translated in English.

The Applicants and Certified operations can demonstrate compliance with the recordkeeping requirements under the NPOP applicable regulations by ensuring that the records maintained are up to date and sufficiently document the practices, procedures, and inputs used by the operation. The records must fully disclose all activities in sufficient detail and in a format that can be readily understood, audited, and available for inspection. Certified operations must make records available for review by the ZENITH, Accreditation Authorities, the applicable State program's governing State official during normal business hours. The certified operations must submit annually an updated OSP, which includes documentation of any deviations in the practices, procedures, and inputs from what was specified in the previous year's OSP and any changes to the previous year's OSP that will be undertaken in the coming year. Documenting such changes allows ZENITH to verify an operator's compliance with the applicable standards requested for certification.

ZENITH will not discriminate on the basis of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, or marital or family status. ZENITH will accept all production or handling applications that fall within its area(s) of accreditation and certify all qualified applicants, to the extent of its administrative capacity to do so without regard to size or membership in any association or group

ZENITH here obliged to report violations of health or safety to the appropriate local, State, or Federal officials. In India, report to APEDA, New Delhi. Further, organic certification will not be granted or continued when current health or safety inspections have not been granted or renewed for the facility.

"Records must fully disclose all activities in sufficient detail and in a format that can be readily understood, audited, and available for inspection. Certified operations must make records available for review by the APEDA."

Applicant/ operator must inform ZENITH of any COI (conflict of interest) identified with assigned inspector. Operator/ Applicant has the right to refuse the selected auditor in case of conflict of interest.

In case an Operator wants to change the inspector, operator shall inform ZENITH in writing via email , stating the valid reasons for the same, before the commencement of inspection. ZENITH will review and decide on the request **within 3 working days** and inform the operator. The decision of the ZENITH shall be final. In case operator changing CB (from another CB to ZENITH), the previous CB will be contacted for control file of transferred operator (Inspection report, decision, complaints, certificate, other essentials as required), APEDA will be informed of same for all NOC operators.

Complaints: *Complaints related to the certifier may be addressed in writing to the APEDA (Visit APEDA website*
https://apeda.gov.in/whoswho?combine=&field_sectors_target_id=40&field_designation_target_id=14&field_city_taxonomy_target_id=All

Complaints must be submitted to ZENITH on id cad@zenithcertifications.com.

Confidentiality : ZENITH will handle confidentially all information obtained during the certification process. This is part of our certification contract. However, we have to inform the NPOP annually about the certified operations.

In case ZENITH granted certification, and in between ZENITH interprets the clarity on certain requirements implementation (with AB's) that affects integrity per Scheme requirement, then in such case ZENITH will indicate client to omit such activities along with justification.

Rights and Duties of the Operator:

1. Signing Contract does not constitute certification by the ZENITH. Certification by the ZENITH is deemed granted when a scope of certification is issued by ZENITH
2. Provide complete and accurate information on organic system or management plan and other application materials representing my/our operation.
3. Comply with the NPOP Regulation, including implementing appropriate changes whenever they are communicated by the ZENITH , Import Export trade requirements of respective regulatory requirements.
4. Provide description of the organic and/or in-conversion production unit and, where relevant, of the non-organic production units and of the activities to be performed in accordance with Regulation requested for certification.
5. Take the relevant measures to be taken at the level of the organic and/or in-conversion unit and/or premises and/or activities to ensure compliance with Regulation requested for certification
6. Take the precautionary measures to be taken in order to reduce the risk of contamination by non-authorised products or substances and the cleaning measures to be taken throughout the stages of production, preparation and distribution;
7. Confirm not being certified by another certification body in relation to activities carried out regarding the same category of products, including in cases in which operators or GG operate at different stages of production, preparation or distribution. Notify in application of any dual certification activities, failure to notify leads to appropriate Disciplinary and Adverse action
8. Confirm that members of a grower group are not certified on an individual basis for the same activity for a given product covered by the certification of the group of operators to which they belong;
9. Recognize that official language of doing business with ZENITH is English and submit all required documentation and communication in English. Some exceptions may apply where ZENITH accepts Operators submission in another language appropriate annotations in English provided for relevant parts.
10. Establish, implement, and update annually an organic production or handling system plan;
11. Submit the applicable fees charged by the ZENITH
12. Represent products as being “Certified by ZENITH” only when those products are listed on a current certificate issued by ZENITH.
    a. Any use of the ZENITH name, logo, or certification mark, in communication media such as documents, brochures or advertising or anywhere else without current certification by ZENITH and written permission from ZENITH, is strictly prohibited and constitutes an infringement of the ZENITH trademark.
    b. Should not use product certification in such a manner as to bring the ZENITH into disrepute and does not make any statement regarding its product certification that the ZENITH may consider misleading or unauthorized;
    c. Upon surrender, suspension, withdrawn or Cancellation of certification, discontinue use of any labels or advertising materials that contain any reference to certification by ZENITH and return or destroy all certificates and packaging material containing references to ZENITH. Operator or GG shall inform in writing the buyers of the product in order to ensure that the indications referring to the organic production method are removed from this production.
13. Reproduce ZENITH certification documents (such as certificates, TC) in their entirety while providing to any other interested parties. The product certification will not be used in a manner as to bring ZENITH into disrepute.
14. Inform ZENITH in the event of certification with another agency for any other category or products. Information and data related to activities of this operation may be shared with other certification agencies and government authorities as and when required.
15. Operator or GG shall hereby given consent to:

i. Allow authorized representatives of ZENITH Certification Pvt Ltd (shortly named "ZENITH"), the officials of Accreditation Body, Regulatory body or other applicable government official (as applicable to certification request under standard or regulation) to observe the inspections and access to such records during normal business hours for review and copying to determine compliance with the regulations; and have an authorized representative knowledgeable about the operation present during the inspection;
ii. Permit on-site inspections and make necessary arrangements for evaluation with complete access to the production or handling operation, including noncertified production and handling areas, structures, accounts and relevant supporting documents, offices and subcontractors; as well as additional inspections, which may be announced or unannounced, additional monitoring control visit or as a part of complaint investigations as per the standard's requirements.
iii. Provide the control authority or control body with any information necessary for the purposes of the controls
iv. Inform immediately the control authority or control body in the event of withdrawal from organic production
v. Accept the enforcement of the corrective measures established by ZENITH in the event of non-compliances, infringement or irregularities, complaints, residue analysis.
vi. Investigate and keep record of all complaints relating to compliance with certification requirements and make these records available to ZENITH when requested, and Take appropriate action with respect to such complaints and any deficiencies found in products that affect compliance with the requirements for certification and Document the actions taken.
vii. Immediately notify the ZENITH concerning any:
    a. Application, including drift, of a prohibited substance to any field, production unit, site, facility, livestock, or product that is part of an operation; and
    b. Change in a certified operation or any portion of a certified operation that may affect its compliance with the regulations.
    c. In the event of withdrawal from organic production.
viii. Confirm that the Certification (including Director/ Promoter) has not been Terminated twice, and debarred from organic certification in past 5 years
ix. Submit, when requested by the control authority or control body, the results of its own quality assurance programmes
x. Inform buyers of the products in writing and without undue delay, and to exchange relevant information with the control body, in the event that a suspicion of non-compliance has been substantiated, that a suspicion of non-compliance cannot be eliminated, or that non-compliance that affects the integrity of the products in question has been established
xi. Allow the release of information as required by law or the applicable standard for which certification is granted. This includes the name of the operation, contact information, type(s) of operation, products produced, area holding, Product analysis result and the effective date of the certification.
xii. Accept the transfer of the control file in case of a change of control authority or control body
xiii. When required for export purposes and transfer of certification, Accept transmission of control files to other control body and vice versa including :

a) The status and validity of certification, including cases of scope reduction, suspension and withdrawal as referred to in regulation and certification requirement
b) Reports of inspection
c) The list of non-compliances and the measures put in place to address them, and the fact that all non-compliances were addressed
d) Information relating to any ongoing dispute relevant for the certification of the operators or groups of operators.
e) Any other element that may be considered relevant.

xiv. To perform the activities in accordance with the organic production rules and maintain all records applicable to the organic operation (including in-conversion) for not less than 5 years beyond their creation;
xv. Allow authorized representatives of ZENITH to take samples of plants, soil, crops, or other substances for testing to be used in the assessment of compliance to certification standards;
xvi. Comply with all requirements and/or conditions levied by ZENITH as a result of its review of our application file and associated documents including inspection information.

Rights of Operator: ZENITH shall,

1. Share the latest version of applicable Organic Standard, Licensing & Labeling Guide with operator.
2. Share the copy of Complaint Handling Procedure and Appeal Procedure with operator.
3. Inform applicable fee to operator.
4. Update operator regularly about the changes in the standards and new standards.
5. Share application procedure and renewal procedure with the operator.

Duties of the ZENITH: ZENITH shall,

1. Intimate operator in relevant to intended changes before implementing any changes in the form or date of certification activities
2. Inform operator or applicant about regulation, changes to the regulation and certification requirements and of any substantial changes to the certification procedures through website, email circulation followed by advisories or instructions. Clarification on regulatory/ standard requirement may be explained through any means : virtual meetings, Email, Telephonic response as deem fit and necessary upon requested by operator
3. Permit the operator a reasonable period, being not less than three (3) months, unless otherwise determined by the scheme owner or regulatory body or authority, to implement any changes arising from updates to the applicable regulatory requirements and/or procedures that come into force during the period of this certification Agreement or Contract.
4. Conduct initial review, inspection, monitoring, sampling for residue and desired contamination analysis, complaint investigation and certification procedure for operator/ Applicant against accreditation certification scheme or programme requirements requested for certification.
5. Issue inspection report including observations with all non-compliances, requirements, additional information, analysis report found during the office evaluation and field inspection to operator or applicant and which require corrective action from operator.
6. Evaluate and respond to corrective actions which the operator takes and update and finalize the certification decision as necessary. When all necessary requirements are met, grant certification or proceed with adverse action as deemed fit to the applicable standard/ regulation and certification procedure.
7. Supply invoices to the operator for applicable fees due.
8. Respond to any request for appeal or complaints in accordance with the requirements of the ZENITH policy and Procedure.

Confidentiality:

9. During the contract period or after contract period any of the party, the operator and ZENITH shall keep all the commercial and business information, circumstances, data and events of the other parties, Information obtained from sources other than the client (e.g. from the complainant or from regulators) are strictly confidential. This commitment covers all the staff and other persons of the parties concerned.

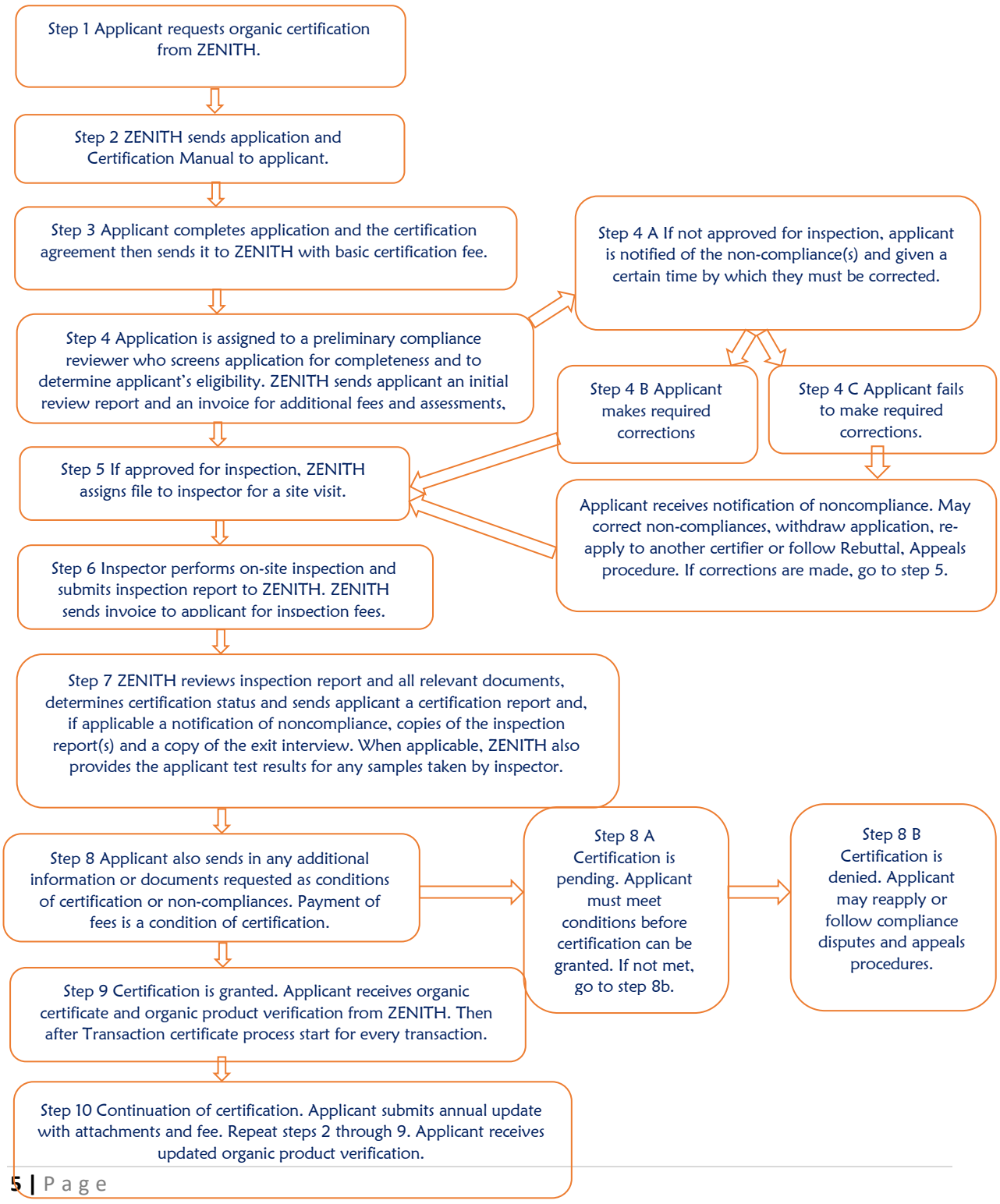
10. The followings are exempted from this :-

a. Information to competent authorities in accordance with the regulations and standards to which ZENITH is accredited.

b. The Exchange of information (e.g. for the purpose of responding to complaints , control files) with any certification/inspection body, as required by applicable standards.
c. Release of the information to third parties on special request of the applicable accreditation body.

Information pertaining to the Listing of operators name, address and relevant certification status of the applicable regulation to be listed in public.

Certification Flow Chart



	Procedure	Applicant or client	ZENITH Procedure
1	**Request/ Enquiry**	Commonly, applicants present a first general request, asking about requirements, procedures, quotation for certification To request certification, operator shall contact Zenith Email ID: info@zenithcertifications.com.	• The applicant receives a first package of information (Enquiry Form) from ZENITH, by e-mail, website, or often combined with individual additional information by phone as and when required. This package includes: • Certification Steps/Procedure, • a brief information concerning requirements in the respective area (e.g. crop production, wild collection, processing). After receiving relevant information {No. of Products range, Area , No. of farmers (in case of GG)} Quotation will be raised , based on their operation activities. You may Refer ZENITH Certification Fee structure. • Once Quotation is Accepted by Applicant/client, Next Sequential Steps will be followed. **Within 7/10 days enquiry will be responded.** **QA or admin will review Scope (Approval status) for before further proceedings**
2	**Formal application**	Application Packets for certification Shared with Client.	Upon acceptance of quote, Detailed application form will be sent.
3	**Working out the organic management plan**	The applicant must return the completed Organic System Plan(OSP)/Organic Management Plan (OMP) and supporting documents to the ZENITH office with the required fee for certification.	Application request will be responded within 5 business days.
4	**Application Review AND Preliminary Compliance Review**		➢ ZENITH reviews the OMP with essential Appendix and informs the client about the result of this review. All applications will be processed within approximately 4-6 weeks (15 working days, if expedited) of receipt of the complete application and paid deposit. *In case operation have Previous Non Compliances, Applicants may be asked for additional information and supporting documentation before moving forward with certification- Inspection Stage. ➢ Approved Input list, Non Organic seed/ingredient approval will be processed at this step and shared to operator with OSP approval letter.

			* After the review is complete the applicant will be notified of any findings or additional information required. The applicant is notified in writing of the results of the initial compliance review. An application may be rejected. If so, the applicant will be notified in writing of the reasons. If an applicant was previously certified by another certifier, then the applicant must provide their previous certification history, including documentation to support the correction of any preexisting non-compliances, and report any adverse actions (e.g., Notices of Proposed or Final suspension or cancellation or withdrawn). ZENITH will contact previous certifier to provide operations control files (inspection report, certificates, non conformities, adverse action, any additional conditions if any with their closure status. ZENITH will ensure that all non-compliances and any subsequent adverse actions were correctly reported and successfully corrected. The information provided regarding previous certifications will be thoroughly verified, both during reviews and inspections. ***In renewal case , OMP need to submit as Full.**
5	**Audit Plan & On-Site Inspection/Evaluation**	Audit Plan will be notified to Applicant. The responsible person must be present, records must be prepared. The Exit Interview is signed by the client or an authorized representative who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. A copy of the Exit Interview form will be left with the applicant by the inspector.	Within a reasonable time, Inspection will be scheduled as soon as practical after the initial review indicates the operation's ability to comply. The inspector verifies, whether the management plan is consistent with the reality, and identifies any findings. ***Note : The remainder of the certification fees will be final invoiced after the site inspection has been completed and must be paid in full prior to receiving certification.*** The inspection shall be carried out through the Mobile Application developed and integrated with TraceNet for the purpose of inspection and certification.
6	**Inspection report**		After the applicant's operation is inspected, the inspector forwards an inspection report to the ZENITH office for review.
7	**Final Certification Review and Certification Decision (initial certification Decision)**		Certification is granted based on the determination that: • The applicant is in compliance with its organic system plan and all procedures; • The activities of the applicant's operation are in compliance with the regulations; and

			• The applicant is able to conduct operations in accordance with the plan. **There are basically three possibilities:**	
			a) Client fully complies with the standard	Certificate is issued and sent to client with a copy of the on-site inspection report and Exit interview, as approved by ZENITH
			b) Certification with conditions	Certification with conditions, if there are minor, non-violative issues. This will be verified during next renewal application or within the time line stated in certification letter (OFI could be verified in Next Inspection)
			c) Client has non-compliances (Major)which need to be corrected. This may include missing documents, or more substantial things.	ZENITH issues Notice of Noncompliance. Certificate is issued once ZENITH has evidence of correction of non- compliances (in some cases, this may involve an additional/Follow up inspection depending upon severity).
			d) Client could not able to correct Non Compliances within specified time limit	Adverse Action Procedure will be followed, which may Lead to Certification Suspension/Cancellation (As applicable)
8.	**Annual Update & Certification Renewal**	Operator will be notified for renewal timeline and include renewal application packet to be submitted by operation. A certified operation must submit an updated OSP and fees to its certifier at least once per year to continue its organic certification.		• If the operation fails to submit its annual update and/or fees, then ZENITH will issue a Notice of Noncompliance. • The annual update only requires to describe changes to the operation; it does not need to reiterate information that was previously submitted. • The annual update must include a summary statement outlining any changes to the OMP that were made during the last year, as well as any changes planned for the coming year. ZENITH may ask client for the supporting

				documentation to verify these changes. • Operations must also notify of any ongoing changes that may affect its compliance with the regulations. • If an operation plans to add new products, fields, operations, or labels to its OSP, then the ZENITH will first review and approve these changes and may issue an amended certificate after determining satisfactory compliance. • A request to add new fields, or facilities, production line, unique production equipment, to its certification would require an additional onsite inspection and sampling (as deem fit). Based on satisfactory inspection result and analysis report (if any) decision will be taken and notify decision to client. • ZENITH will inspect the operation annually to determine whether its certification should continue irrespective to the failure of an operation to submit an annual update. • If an operation fails to submit an annual update prior to the onsite inspection, ZENITH will formally close the operation or ask operator to surrender • After inspection, certification decision process will be completed based on review of annual

				update and inspection report. Certification decision will include one of the four certification decisions above indicated in point 7 and communicates this decision in writing to the operation. • As with the initial certification decision, the decision to continue certification may include new conditions for minor, non-violative issues. However, if an operation shows evidence of a repeated minor issue, ZENITH will elevate the violation to a Major Noncompliance.
	***Additional Checkpoints to be taken Care as per mentioned Cases:**			
	A) Non-Organic Seed/Planting Stock Approval	It is Mandatory to have Non organic seed/Planting stock approval prior to Sowing. ***(Seed/ Planting stock Assessment, Organic Seed/ Planting stock Searches , Any Test Report {if available} must be Submitted for Evaluation)***	• Operator must submit documentation of each substance to be used as a production or handling input. This should include the input's composition and source, as well as the location(s) where and frequency with which it will be used. • ZENITH will forward relevant information to Evaluator. Upon Analysis Completion, Approval will be Confirmed Via Email. • Will verify all inputs and ingredients listed in the OSP comply with the regulations. • review all multi-ingredient products before they are sold, labeled, or represented as organic to ensure that the product composition meets the requirements for the proposed labeling category. • verify the use of any nonorganic ingredients or processing aids to determine that they are allowed. • review all retail product labels for compliance with the labeling requirements. • All approvals, disapproval (with reason) record of inputs, ingredients, labels will be kept at client file. • During the onsite inspection, inspectors will review a sample of these products to determine compliance.
	B) Use of Non-organic agricultural ingredients for processed organic food	It is Mandatory to have **Non organic agricultural ingredients approval** prior to usage ***(Commercial Availability Search details must be Submitted for Evaluation, Refer OMP)***. Applicant need to ensure access to certain agricultural ingredients, and where such ingredients are not available in appropriate form, Quality or in sufficient quantity.	

	C) Input Review	All inputs intend to use require prior approval from ZENITH. See the list of inputs allowed & prohibited to use in organic production and handling operation. The list helps operator to navigate and choose the appropriate input for use. Operators must go through the list of respective standards prior to request for input approval. https://npop.apeda.gov.in/sites/default/files/2024-10/NPOP_Eight_Edition_2024.pdf	• Note: An operation should consult its certifier (ZENITH) prior to using any new input in order to ensure that the material complies with the regulations. The use of an unapproved material may be considered an application of a prohibited substance, which would remove the operation's land from certification for three years ***Note that : Client can submit request for input at any time (i.e. During audit, in mid of the year) , ZENITH will accept the request and evaluate input per standard requirement and approval status will be intimated to client accordingly.***
	D) Product Addition in Mid of the Certification Cycle	Request for product addition, Per mentioned cases: 1. **Case-1** If the new products apply with the similar process, and the concern process was earlier approved during certification. Operator need to request product addition Followed by submission of Supplier List, Organic Product and Supplier Scope Certificate **2. Case-2:** If the new products apply with the different process, which was not approved during certification. Operator need to request product addition Followed by submission of Supplier List, Organic Product, Process Flow Chart and Supplier Scope Certificate ***(Note that Label must be approved, prior to usage, usage of unapproved labels may lead to Noncompliance).***	➢ For the product addition, Further proceedings will be done as per below mentioned Cases: **1. Case-1:** ➢ If the new products apply with the similar process, and the concern process was earlier approved during certification. Zenith will add products after verifying Supplier list, Organic Product list and Supplier Scope Certificate. **2. Case-2:** ➢ If operator apply for new products with different process, which was not approved during certification. Zenith will review the OMP Addendums (Supplier list, Organic Product list, Process Flow Chart and Supplier Scope Certificate) and then conduct onsite inspection for verification of new process. ➢ After the applicant's operation is inspected, the inspector forwards an inspection report to the ZENITH office for review. ➢ Final Product Addition Review and Decision will be done as per point 7 (Final Certification Review and Certification Decision).
	Precautionary measures to avoid the presence of non-authorized	Where an operator suspects, due to the presence of a product or substance that is not authorized for use in organic production in a product that is intended to be used or marketed as an organic or in-conversion product, that the latter product does not comply with the Regulation, the operator shall:	

	products and substances	(a) Identify and separate the product concerned; (b) Check whether the suspicion can be substantiated ***(where the suspicion of non-compliance concerns an incoming organic or in-conversion product, the operator shall check whether: i) the information on the label of the organic or in-conversion product and the information on the accompanying documents match; (ii) the information on the certificate provided by the supplier relates to the product actually purchased ; where there is a suspicion that the cause of the presence of the non-authorized products or substances lies under the control of the operator, the operator shall examine any possible cause for the presence of non-authorized products or substances);*** (c) Not place the product concerned on the market as an organic or in-conversion product and not use it in organic production unless the suspicion can be eliminated; (d) Where the suspicion has been substantiated or where it cannot be eliminated, immediately inform the relevant control body, and provide it with available elements ***(like (a) information and documents about the supplier (delivery note, invoice, certificate of the supplier, TC); (b) the traceability of the product with the lot identification, stock quantity, and quantity of product sold; (c) laboratory results, from accredited laboratory when relevant and available; (d) the sampling sheet detailing the time, place and method used to take the sample; (e) any information about any previous suspicion with regard to the specific non-authorised product or substance; (f) every other relevant document to clarify the case);*** (e) Fully cooperate with the relevant control body, in identifying and verifying the reasons for the presence of non-authorized products or substances
		* When appropriate, operators are required to retain signed statements from all suppliers verifying that no genetically engineered products were supplied.

Additionally for any new addition request during audit, Inspector can collect request details with accompanying docs. A request to add new fields, animal species, or facilities would require an additional onsite inspection.

Note: A certified operation may surrender its certification at any time.

Withdrawal of Application for Initial Certification

The initial applicant may withdraw its application at any time by notifying ZENITH in writing specifying reason for withdrawal. An initial applicant who withdraws its application shall be liable for the costs of services provided up to the time of withdrawal of its application. An applicant that voluntarily withdraws its application prior to the issuance of a notice of noncompliance will not be issued a notice of noncompliance. Similarly, an applicant that voluntarily withdraws its application prior to the issuance of a notice of certification denial will not be issued a notice of certification denial.

Frequency of annual inspection:

- At least once every year
- Every year following types of inspection will be selected either randomly or selected based on results of the potential risk to organic integrity, and for other reasons deemed necessary.,
  - minimum of 5% of ZENITH's operators (Sampling) in the NPOP program (additional sampling will be drawn in case of suspicion)
  - Additional Inspection- 10% of the Annual inspection. ;
  - Unannounced Inspection- 10% of (Annual+ Announced) Total Inspection

Transaction Certificate Checkpoints:

1. Zenith will shall issue Transaction Certificates (TC) for all transactions.

2. It shall be mandatory for all the organic Operators who are involved in transaction of organic products either in the domestic or export market to take a TC. In case the organic product is intended for sale in the domestic market only, the TC shall be taken mandatorily till final packing to consumer product in the supply chain. Thereafter, the stock shall be closed as domestic consumption

3. Transaction Certificates are issued on Tracenet in the prescribed format after the certified Operator has provided all the required documents. The Certification Body shall take reasonable measures to verify that the information provided is correct and all the documents have been submitted in original before issuance of the Transaction Certificate.

4. Zenith shall not delay issuance of the transaction certificate after receipt of all documents and verifying that they are in order and issue the same as per the following timelines:

a. **TC from grower group/ individual producer to trader/processor:** within 5 working days

b. **TC between processor/trader &processor/trader/retailer (domestic transactions):** within 3 working days

c. **Export TC:** within 7 working days.

5. Above timelines are subject to submission of complete documents and will not be applicable in cases where physical verification is required, based on risk analysis. Wherever applicable, the original Transaction certificate(s) of a purchased product that has been sourced and certified by another Certification Body shall be verified before issuance of the Transaction Certificate.

You may request NPOP standard by writing email to ZENITH at info@zenithcertifications.com or may also find Regulation on mentioned Link:

- https://npop.apeda.gov.in/sites/default/files/2024-10/NPOP_Eight_Edition_2024.pdf : NPOP Regulation 8th Edition 2024 (English)
- https://npop.apeda.gov.in/sites/default/files/2025-01/NPOPeightedition2024hindiversion.pdf : NPOP Regulation 8th Edition 2024 (Hindi)
- https://npop.apeda.gov.in/sites/default/files/2024-10/NPOP_PROCEDURES_2024.pdf NPOP Procedure 2024
- https://npop.apeda.gov.in/NPOP-Notifications : NPOP Notifications

Further on Zenith website Resource page https://zenithcertifications.com/resources/ , you will be able to find link of NPOP regulation and Notification **(it will be uploaded once Zenith receives accreditation).**

***Refer Zenith website https://zenithcertifications.com/ for detailed information.**

*** All financial transactions are done in Indian currency (Fee structure is as per the structure outlined in NSOP and same has been filed with APEDA)**

*** Zenith informs the operator about the standards and other requirements for certification (Share Guidelines) via mail or Operator can visit Zenith Website as mentioned.**

*** ZENITH shall bear the cost of analysis and residue testing for the mandatory 5% testing required under NPOP regulation (annual sampling plan).**

2. Changes Affecting Certification:

1. Certified operations shall immediately notify ZENITH in the event of emergency pest outbreak, a prohibited substance (including drift) has been applied to any field, production unit, site, facility or product that is part of the operation, as well as changes to an operation including but not limited to: new field, facility, production line, unique production equipment, animal herd, or animal facility to its certification, then the certifier will conduct an additional inspection before issuing an updated certificate. If the operation sells, labels, or represents products from fields or facilities that have not been inspected and that are not included on the certificate, then the operation is in violation of NPOP. Similarly, any new retail labels developed for the operation's organic products must be approved by the certifier before being used. An operation should consult its certifier prior to using any new input in order to The certifier will determine whether and when documentation is required on a case by case basis. ZENITH will take appropriate steps to verify continued compliance with all applicable regulations and standards, including re-inspection when the change may affect the integrity of organic product, or as ZENITH deems necessary to confirm compliance. The certified operation shall not release certified products resulting from such changes until notified accordingly

2. In the event of changes significantly affecting a product's specification or changes in the standards to which compliance of the product is certified, or changes in the ownership, structure or management of the supplier, if relevant, or in the case of any other information indicating that the product may no longer comply with the requirements of the certification system, the scope of certification may be amended accordingly

3. If the operation sells, labels, or represents products from fields or facilities that have not been inspected and that are not included on the certificate, then the operation is in violation of NPOP

4. Some **examples of situations that would require operator to notification to the certifier (ZENITH) include following:**

a) Application of a prohibited substance to any field, production unit, product or site involved in organic production or handling, regardless of whether it was a direct application or drift from a neighboring area, and regardless of whether or not it was intentional. The operation must notify the certifier immediately of any such events;

b) Damage to the site, e.g., damage by fire or natural disaster such as a flood

c) Addition of acreage, a new field, product line, production facility, animal herd, or animal facility, new input or change in approved input formulation, change of input/ingredient/ sub ingredient supplier (Approved earlier), new post harvest handling activity;

d) Change of legal entity, change of ownership, change or physical / mailing address

e) Removal of a field or portion thereof from organic production;

f) Removal/ sanction of group member from the group, Addition of group member, Major non-compliance identified by ICS affecting certification and affect the compliance with regulation

g) Development of a new retail label for the operation's organic products, new label, change in label;

h) New processing or handling of organic products, process or facility not already specified in the OSP; and

i) Any change in the operation's practice, input, or procedure that may affect compliance with the regulations.

5. The operation must notify changes in writing. The notifications relevant to changes will be placed in client file, the concerned certification specialist will be notified of change notification received , so that the information may be reviewed and verified as part of the annual certification process, If necessary, ZENITH may require the operation to submit additional documentation at the time of notification. ZENITH will determine whether the documentation required at the time of review or during inspection. Operator will be notified for same.

6. When there is a change in ownership of a certified Operation, the certified Operation must apply for and receive new certification from a ZENITH prior to selling, labeling, or representing products as organic.

7. ZENITH reserves the right to conduct special inspections during the course of the certification period, and as needed in response to changes/incidents. Where such changes may affect the conformity of the product(s) and/or the Operation's OSP, ZENITH as appropriate determines whether the announced changes require further investigation and schedules a special inspection as necessary.

8. The Supplier must not promote products, processes, and/or facilities/sites which have not been covered in the scope of certification as inspected and approved by ZENITH. Unauthorized promotion will result in the withdrawal of the Certificate.

9. Where Operation fails to notify ZENITH of any of the above changes, ZENITH may accordingly suspend or withdraw, as deemed appropriate, the Certificate and reserves the right to retroactively invalidate the Certificate effective as of the date the change occurred.

10. When new or revised standards requirements including APEDA Advisories and notifications are issued that affect the certified operations, ZENITH shall ensure these changes are communicated to all certified operations and shall verify the implementation of the changes by the certified operations at the next scheduled inspection and may take other appropriate actions as required.

11. Relevant updation shall be made in Certification procedure, forms etc for necessary adherence to regulatory requirements. Minimum 3-month transition period will be given for its effective implementation unless any condition requires immediate implementation.

3. Policy and procedure on criteria for acceptance and Rejection of applicant from other Certification bodies

Application acceptance criteria:

- Application received within accredited scope and programme
- In case of NOC operations , 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.
- Shall have a valid certificate during issuance of NOC and registration with new certification body.

Application rejection criteria:

1) Application requested for unaccredited scope or category,
2) Suspended operation: If the license is suspended by certification body, application will not be accepted within its validity period and until its successfully closed by respective certification body
3) Revoked / Terminated operators: Below 3 conditioned (terminated operators) will not be accepted

a) In persuant to NPOP 4.4.2.5 (i), where certification of an Operator (including Director/ Promoter) has been terminated, the Operator can apply for recertification after a period of two years (2 yrs) from the date of termination.
b) In persuant to NPOP 4.4.2.5 (iii), In case of Operators (including Director/Promoter) where in certification has been terminated twice, such Operators shall be debarred from organic certification for five years (5 yrs).
c) In persuant to NPOP 7.4.3.4., if A license revoked by the accreditation authority

4) A conflict of interest that could undermine the impartiality of our decisions
5) (Initial applicant):Not responding on non compliance until deadline, with 2 additional reminder deadline, ZENITH will denial of certification request
6) **Inconsistent Derogation Request:** Application requested for derogation doesn't meet criteria and unable to submit documentary evidence during application stage as defined in NPOP 3.1.4 (A & B)
7) In persuant to NPOP 7.5.5, In case when ZENITH may call for any supplementary information or documentary evidence from any applicant in support of or to substantiate any statement made by him in his application, within such time as may be directed by ZENITH, and non-conformity with such direction may have the effect of the application being summarily rejected by ZENITH
8) Non payment of certification fee/ dues by the applicant
9) Dual Certification ((i.e. multiple certifications for the same scope of activity under different certification bodies under NPOP)
10) Not giving information in timely manner /False information
11) If it lacks any manpower for the certification activities.

4. Policy of Non-Discrimination

- ZENITH is committed to maintaining impartiality and ensuring that all certification activities are conducted without discrimination or undue influence. To uphold this principle, ZENITH has establish and maintain a governance structure that enables it to operate independently, free from any vested interests or external pressures that may compromise its objectivity or impartiality.
- Zenith shall take all necessary measures to prevent any form of discrimination against applicants, clients, or stakeholders, regardless of size, membership of any association or group, or the number of certifications already issued. All certification decisions shall be based solely on objective evidence of conformity and compliance with established standards.
- ZENITH will not discriminate on the basis of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, or marital or family status. ZENITH will accept all production or handling applications that fall within its area(s) of accreditation and certify all qualified applicants, to the extent of its administrative capacity to do so without regard to size or membership in any association or group. The ZENITH Certification Program encourages all qualified producers of organic foods or processed products to apply for organic certification. ZENITH provides services to all applicants whose activities fall within ZENITH's scope of operations accredited. Access to the certification services of ZENITH is not dependent upon the size of the applicant's operation, the number of certificates already issued, or membership in any group.
- Zenith ensure that decisions on certification are taken by persons other than those who conduct the inspection and evaluation of the Operators.

Provision for Non-Discrimination in Access to Certification:

ZENITH is committed to ensuring fair and equitable access to its certification services. As part of its policy of non-discrimination, Zenith ensure that its policies, procedures, and practices do not create any unnecessary barriers or limitations to access certification, other than those explicitly required by the applicable standards.

All applicants, regardless of their organization's size, structure, affiliation, or location, shall be given equal opportunity to apply for certification, provided they meet the standard-specific requirements. No additional requirements, conditions, or restrictions shall be imposed that may unfairly impede or inhibit access to certification.

Zenith continuously reviews its processes to ensure alignment with the principles of impartiality, transparency, and non-discrimination, as required under relevant international conformity assessment standards ISO/IEC 17021, ISO/IEC 17065.

Non-Discrimination in Application Package :

Zenith ensures that its application package is free from any clause, condition, or language that may directly or indirectly inhibit access to certification for any specific group.

All individuals and organizations seeking certification shall be treated equally and fairly, with access based solely on their ability to meet the relevant certification requirements. The

application package, including forms, instructions, and associated documents, shall be designed to be inclusive, objective, and compliant with applicable non-discrimination principles.

Zenith shall regularly review its application documentation to ensure it:

- **Does not favor or exclude any group based on size, legal status, membership, geographic location, or affiliation;**
- **Aligns with the requirements of international standards such as ISO/IEC 17021 , ISO/IEC 17065;**
- **Supports the Zenith commitment to impartiality, transparency, and accessibility.**

Conflict of Interest: The following policies are in place to prevent conflict of interest:

1. Freelancers and consultants shall be excluded from the Certification Programme to prevent potential conflict of interest due to their engagements with multiple certification bodies. However, Zenith can utilise their expertise in training and capacity building of their human resource and technical guidance.
2. Not permitting any employee, inspector, contractor, or other personnel to accept payment, gifts, or favors of any kind, other than prescribed fees, from any business inspected.
3. Not giving advice or providing consultancy services, to certification applicants or certified operations, for overcoming identified barriers to certification;
4. Requiring all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest disclosure report
5. **Indirect conflicts of interest will be avoided by having that operation's file handled and reviewed by ZENTIH staff members who do not have any conflicts of interest with that operation.**

5.Guidelines for Organic Crop Certification

The following guidelines are based on the National Programme For Organic Production (NPOP) . In order to be eligible for organic certification, farms must be in compliance with the following standards.

Organic Crop Production

Organic crop production management should include a variety of planting schemes. For perennial crops, this should involve plant-based ground cover crops. For annual crops, this should incorporate diverse crop rotation practices, cover crops (green manures), inter-cropping, or other diverse plant production methods.

Conversion period

A conventional farm must undergo a conversion period before products can be sold as organic. During the conversion time, all rules of organic production must be kept, according to the NPOP standard.

Annual crops: Conversion Period of at least two (2) years (Organic Management) before sowing (the start of the production cycle).

Perennial crops: perennial plants other than grassland (excluding pastures and meadows), the first harvest may be certified as organic after at least three (3) years of organic management.

* The start of the Conversion Period may be calculated from the date of first inspection of the Operator by the Certification Body*

Example to determine if a field qualifies: Producer Mango Orchard inspected on 31 May, 2024 by the Zenith.

On May 31, 2025 first transitional year has ended.

On May 31, 2026 second transitional has ended.

On May 31, 2027 third transitional year has ended.

This means after May 31, 2027 crops harvested can be certified organic.

The Certification Bodies shall decide, in certain cases, for extension or reduction of the Conversion Period, depending on the past status/use of the land and environmental conditions

Exceptions/Derogations:

NPOP 3.1.4 states that Previous period may be considered as upto full Conversion Period for annual as well as perennial crops, as an exception, wherein documentary proof is available that the following requirements have been met, for a continuous period of minimum three (3) years or more.

During conversion:

From second year of conversion on, products can be labelled as “in conversion” to organic farming.

(Note: At least 12 month Conversion period must be complied in order to claim in-conversion)

- Plant reproductive material, provided that a conversion period of at least 12 months has been complied with;
- Food products of plant origin and feed products of plant origin, provided that the product contains only one agricultural crop ingredient, and provided that a conversion period of at least 12 months before the harvest has been complied with

Split and Parallel Production *(An operation that produces or handles both organic and nonorganic agricultural products/ in-conversion products)*

Parallel Production :
Parallel production is the simultaneous production/processing/handling of crop(s) or product(s) in organic and non-organic systems of visually indistinguishable crops/ products.

Non-organic and organic units in the same area are subject to specific control requirements that could include physical, financial, and operational separation (including storage premises) and that all measures are in place to prevent commingling and contamination.

Following conditions must be fulfilled by all certified operators:

- Adequate buffer zones must be established and maintained to clearly demarcate certified organic production areas from conventional or non-certified areas.
- These zones help minimize the risk of contamination through drift or runoff.
- Crops must be visually distinguishable from non-certified crops at all times to allow for clear identification during inspection and harvest.
- Inspections shall be conducted at critical stages of the crop cycle (e.g., sowing, vegetative stage, flowering, harvest) to monitor compliance with organic practices.
- Accurate and realistic production estimates must be provided . These estimates are used to verify traceability and to detect irregularities.
- Must have sufficient storage capacity that allows for separate and identifiable handling of certified and non-certified products to prevent mixing.
- maintain well-managed documentation that clearly distinguishes between certified and non-certified production, including input use, field records, harvest logs, and storage records.

Buffer requirements

Land that is certified as organic must have distinct, defined boundaries and buffer zones to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management.

If you are unsure if the buffer or boundary in place on your land is adequate, please contact your certifier for clarification. If there is no buffer in place but you have confirmed with your adjacent landowner/manager that their land management does not pose a risk of contamination, please contact your certifier for clarification of how they prefer that this agreement is documented to allow for inspector verification.

Examples of adjacent land use that may pose a risk: conventional agriculture fields (pesticides, GMOs, etc.), industrial properties, residential properties, roadsides (guardrails, mile markers, road signs, etc.), railroads, utility poles, flood zones, etc.

Diversity in Crop Production:

The foundation of crop production in organic farming focuses on enhancing soil structure and fertility while considering the surrounding ecosystem. This approach aims to reduce nutrient losses and sustain long-term soil health.

Soil fertility and crop nutrient management practice

The organic regulations state that a producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of the soil and minimize soil erosion.

Required crop nutrient and soil fertility management practices:

- Crop rotations (perennials as an exception)
- Cover crops
- Application of plant and animal materials

Accepted plant and animal materials:

- Raw animal manure applied to land
- Composted plant and animal materials
- Uncomposed plant materials

Accepted crop nutrient and soil amendments:

Fertilization must be in accordance with NPOP Annex 3(1), as per applicable standard.

Seeds and planting stock

Producers of organic crops are required to source certified organic seed, annual seedlings and planting stock. If organic seeds are not commercially available, non-organic /Transitional untreated seeds may be used. Commercial availability means that the seed is available in the appropriate variety (growing habits, days to maturity, insect and disease resistance, etc.), quality (cleanliness, germination, etc.), form (size, grade, hot water treated etc.) or quantity the producer needs. Confirm your method of documenting your search for organic seed with your certifier.

Operator must refer / contact regional Agriculture or concerned department for latest updates on GMO crop/ product info and take necessary compliance measure in place as per NPOP standards.

Resource: Refer GEAC (Genetic Engineering Appraisal Committe, Govt of India) http://www.geacindia.gov.in/biosafety-data-approved-GM-crops.aspx to keep an update on GMO notified / approved crops in India.

Accepted:

- Non-organically produced, untreated seeds and planting stock may be used to produce an organic crop when an organic produced variety is not commercially available.
- Seeds and planting stock treated with a substance exceptions as prescribed in Annex 3(1) and (2) of synthetic substances allowed for use in organic crop production.

Prohibited:

- Non-organically produced, untreated seeds and planting stock used to produce an organic crop when an organic produced variety is readily commercially available.
- Seeds and planting stock treated with a substance NOT included on the Annex 3(1) and (2) substance allowed for use in organic crop production.
- The use of genetically engineered seeds, transgenic plants or plant material is strictly prohibited.

Prior Authorization from Zenith is required; NPOP States that "The producer shall intimate the Certification Body for use of inconversion or non-organic seeds and plant material, season wise in their system plan and the same shall be verified during inspection by the CB".

Pest, Disease and Weed Management (PWD)

Must be Managed through **Management Practices for PWD** (Crop rotation, nutrient management, Sanitation measures, Cultural practices, etc) ; **Mechanical or physical methods for P** (Introduction of predators or parasites , Development of habitat for natural enemies , Non-synthetic controls such as lures, traps, and repellents, etc) and **weed Problems may be controlled through**(Plastic or other synthetic mulches, Mulching with fully biodegradable materials, Mowing , Livestock grazing, Hand weeding and mechanical cultivation, etc) Practices ; **Disease problem may be controlled through** Management practices which suppress the spread of disease organisms, Thermal Process ,Etc.

When organic management practices alone cannot prevent PWD, then authorized Substances list need to be followed as per NPOP Annex 3(2).

**In the event of emergency pest or disease treatment, operators are required to notify ZENITH, immediately if there is any changes in organic product certification.*

Input Usage

Farm inputs, such as fertilizers and crop protection products, need not be "certified" for being used on organic farms. All inputs intend to use require prior approval

Refer ZENITH Input Evaluation Policy for detailed description.

Post-Harvest Handling of Organic Products

Post-harvest handling includes actions such as washing, cleaning, sorting, packing, cooling, storing of raw agricultural products, and facility pest management. These actions can be performed on farms or in handling facilities.

Sanitation: Proper sanitation is required at all levels of handling, transport and storage. The use of disinfectants applied to storage containers and handling equipment must be consistent with the NPOP List.

Irrigation and Wash Water: Ground and surface waters are a potential source for a wide range of contaminants. Zenith raise recommendations for water testing of irrigation and wash if required.

Commingling and contact with prohibited substances

It is required that producers implement measures to prevent the commingling of organic and nonorganic products. It is also required that organic producers protect organic products from contact with prohibited substances.

Soil and Water Conservation

Soil and water resources must be managed sustainably. Measures should be put in place to prevent erosion, soil salination, overuse of water, and pollution of groundwater and surface water.

Record Keeping

Records must be kept on an ongoing basis. Records are essential, as organic certification is about verifying your farming practices to a third party. Maintaining records can also help producers improve their management. Records must be "readily auditable" (accessible, organized, complete) and must be maintained for five years. In general, your record keeping system must allow a third party to trace your management from origin to sales. Many certifiers provide record keeping templates but also accept farm-specific systems, so long as they include the necessary information.

Records that must be kept by certified crop producers include:

- Three year history verification for new crop fields
- Field production logs that include crops planted, dates and rates of manure, compost, fertilizer or other input applications
- Intercultural Operations
- Monitoring records
- Test Reports if any
- Spray records
- Harvest yields for each crop
- Sales records
- Current farm maps
- Purchase records for all inputs (ex. amendments, pest controls)
- Receipts for all purchased seeds (If untreated non-organic seed is purchased, documentation must be available that organic versions were commercially unavailable)
- Production, harvest and/or sales records for buffer crops, transitional or conventional crops
- Records must be maintained for not less than 5 years beyond their creation.
- Recordkeeping system must includes but are not limited to :
- Before the first inspection takes place, the farm must present an organic management plan to ZENITH; this plan must be updated annually
- A farm diary must be kept, recording the main activities (Right from sowing until dispatch/Sale) on each plot
- Financial records ((e.g. purchase orders, contracts, invoices, receipts, report of commodities, settlement sheets, or sales journals)
- Complaint log
- Buffer harvest records – if buffer crops are used
- Identification of product organic, in-conversion, Conventional status in all production /sale or dispatch record
- Lot numbering system/ Use of lot numbers
- Seed Packets/Input Packet (Labels), Seed Search Evidence.

- Keep records proving the need for the use of authorized products, including the date or dates on which each product was used, the name of the product, its active substances, the amount applied, location of such use, the crop and parcels concerned, and the pest or disease to be controlled
- Keep records of any other external input used on each parcel and, where applicable, keep available documentary evidence on any derogation from production rules
- When appropriate, operators are required to retain signed statements from all suppliers verifying that no genetically engineered products were supplied.

6. Brief Introduction of Handling Requirements

Organic Production and Handling System Plan	Operator must be transparent in Sharing their Plan information in ZENITH OMP form. This includes but not limited to as mentioned below: - A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed, monitoring practices in order to verify that the plan is effectively implemented. - A description of the recordkeeping system implemented to comply with the requirements. - A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a parallel operation and to prevent contact of organic processing and handling operations and products with prohibited substances. - Upon receiving organic raw materials, the operator is required to inspect the product's condition and label, as well as the details outlined in NPOP regulation 3.5.2. - Sources of pollution must be identified and contamination prevented. - Every product must have a proper identification throughout the entire process. - Procedures for cleaning, disinfecting, and decontaminating any facility that handles, stores, processes, or handles organic materials. - Genetically modified organisms (GMO) are not allowed. - Take precautionary measures at critical processing steps and keep records of those measures. - If the organic production and handling plan changes, the Operators must notify to ZENITH "on a real-time basis."
Processing Facilities	- Processing methods should be based on mechanical, physical and biological processes or processes mentioned in 3.5.5 of NPOP regulation. - Irradiation/ ionized radiation is not allowed for processing of organic products. - Maps of the facilities and storage areas, ingredient sources, and the flow of the product from its point of origin through the various processing steps, packaging, storage, sale, and transportation should all be included in the organic handling plan. Every product's suggested label and recipe must also be included in the plan; don't print a label until the certifying agency has approved it. - It's not necessary for a facility to process only organic products. As long as organic products don't come into contact with non-organic products or prohibited substances, it can also process conventional products. - Equipment must be cleaned with organically approved cleaning agents or purged with organic products diverted to non-organic sales or use in order to prevent contamination of an organic run. You should document that this purge is sufficient to remove any nonorganic product or residue of a prohibited substance from the equipment. - Cleaning products must be on the National List as per NPOP regulations or rinsed completely. A clear water rinse protocol should detail when the rinse has been effective in removing all residue, as shown by a test strip

	on the equipment surface. You can test once and maintain the protocol, or test each time you do a rinse. - When space allows, it is a good idea to store and label organic ingredients, product and packaging in a dedicated area so employees use the correct items during organic production.
Parallel Processing / Handling *(An operation that produces or handles both organic and nonorganic agricultural products/ in-conversion products)*	- Organic products handling and processing should take place at a different time or place than nonorganic products handling and processing. - Management practices and physical barriers (distinct, defined boundaries) must be established to prevent commingling of organic and nonorganic products on a parallel operation and to prevent contact of organic production and handling operations and products with prohibited substances throughout stage of production and handling with effective documentation and recordkeeping. - The operator shall maintain verifiable, accurate records of both non-organic and organic produce right from their production, harvesting, storage, processing, packaging, transportation and marketing)
Pest Management	- Processing plants need to have a pest-management strategy that eliminates food sources, places of breeding, and habitat in order to prevent pest issues. The plan must also control environmental factors to stop pest reproduction and prevent pests from entering the building. - By following with Good Hygienic Practices (GHP), which include general cleanliness and hygiene, pests should be avoided. Agents that regulate pests should only be used as a last resort. - Conventional pest-control agents may be employed with certification agency approval if materials on the National List as per NPOP regulations are ineffective. It is necessary to take precautions to prevent these prohibited substances from coming into contact with organic goods and packaging materials. When a prohibited pest control product is used, many handlers have secondary trailers where organic ingredients, products, and packaging are removed for a set period of time. - To comply with NPOP regulations, these pest control stages must be documented as being carried out in this order. - According to NPOP regulations, persistent or carcinogenic pesticides, disinfectants & Irradiation/ ionized radiation are prohibited for pest management.
Storage	Organic, in-conversion and conventional products shall be clearly identifiable at all stages of handling and storage. - Organic products shall be stored at ambient temperature or special conditions of storage, which are permitted in NPOP regulation. - Organic products should be stored with their integrity unaffected. Organic products must always be kept separate from non-organic products and from materials and substances that are not allowed to be used in organic processing and handling. - It is prohibited to combine an organic ingredient with the same ingredient in conventional form, and to combine an in-conversion ingredient with the same ingredient in either conventional or organic form.

	▪ Cleaning techniques and materials approved for organic production should be used in storage areas for organic products. It is important to take precautions against potential contamination from any pesticide or other treatment that isn't on Annex-3(2) of NPOP regulation.
Packaging and transport of products to other operators or unit	▪ Operators shall ensure that organic products and in-conversion products are transported to other operators or units, including wholesalers and retailers, only in appropriate packaging, containers or vehicles closed in such a manner that alteration, including substitution, of the content cannot be achieved without manipulation or damage of the seal and provided with a label stating, without prejudice to any other indications required by NPOP regulation or importing country law: (a) the name and address of the operator and, where different, of the owner or seller of the product; (b) the name of the product; (c) the name or the code number of the control authority or control body to which the operator is subject; and (d) where relevant, the lot identification mark in accordance with a marking system either approved at national level or agreed with the ZENITH and which permits the linking of the lot with the records ▪ Whenever possible, eco-friendly packaging materials, recyclable, reusable systems, and biodegradable systems must be used. The product must not be contaminated by the packaging material. Certain additives are permitted for limited use in the production of packaging films for the packaging of organic food items {Annex -3(19)}. ▪ The packaging material must be approved for use by the Certification Body. Conventional, in-conversion, and organic products must be packed and transported according to the following guidelines: ▪ Only when precautions are taken to prevent contamination or commingling can the collection and transportation of conventional, in-conversion, and organic materials be done simultaneously. ▪ The operator is responsible for maintaining the data pertaining to harvest time and days, procurement, transportation, exact product arrival time at the facility, and storage. ▪ Organic product transportation containers should be cleaned with materials and techniques permitted for organic production. It is important to take precautions against potential contamination from any pesticide or other treatment that isn't on Annex-3(2) of NPOP regulation.
Recordkeeping	All certified processing or handling facilities must keep records to show that organic integrity is maintained throughout the process at the facility. These records must show: ▪ Certification for organic ingredients. ▪ A system for tracking products from the point of arrival through processing, storage, and sales, including lot numbers, production logs, inventory, records for storage and sales, cleaning, and pest control. ▪ Recipes that list each ingredient's percentage (apart from salt and water) in each product.

	▪ A product flow chart that shows the steps involved, including the storage of ingredients and packaging, transportation of goods in and out of the process, processing of the final product with all inputs (such as steam or water), and storage of ingredients and packaging. ▪ All non-organic ingredients have to conform to organic standards; for example, the salt cannot contain any artificial flowing agents or processing aids that are listed on the Annex-3(17) and Annex-3(18) of NPOP regulation. ▪ There are no pesticides or other prohibited materials in the packaging. ▪ Inventory management and storage meets organic regulations. ▪ Sales tracked through production to specific ingredient lots or deliveries. ▪ If applicable, documentation proving that incoming and outgoing transportation was clean prior to the presence of organic product. ▪ Pest control that follows the order of activities defined in the Pest Management section. ▪ Keep available documentary evidence on authorizations for the use of non-organic agricultural ingredients for the production of processed organic food. ▪ Keep records of the use of products (External Input/Own Prepared/Any input), including the date or dates on which each product was used, the name of the product, its active substances and the location of such use. ▪ In case of production of composite products, complete recipes/formulae showing the quantities of input and output shall be kept available ▪ When appropriate, operators are required to retain signed statements from all suppliers verifying that no genetically engineered products were supplied.
Ingredients and Processing Aids	▪ For the processing of organic products, ingredients should be use as define in 3.5.4 of NPOP regulation. ▪ A list of each substances/input to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability. The list of ingredients and additives for use in food processing of organic products with conditions for use under these standards are given at Annex-3(17) and Annex-3(18) respectively of NPOP regulation.
Labels	Label must be approved, prior to usage, usage of unapproved labels may lead to Noncompliance. ▪ Labelling shall convey clear and accurate information on the organic status of the product. ▪ Products will be marketed as "produce of organic agriculture" or a similar term once all of the standards' requirements have been met. ▪ By indicating the year of conversion, the label for conversion products must be easily distinguished from the label for organic products. ***Refer ZENITH Labelling Policy for detailed description.*** • Certified operations that change certifying agents voluntarily and have labels which identify their prior certifying agent on products they produce or handle, may not use up existing supplies of labels. New labels must be used immediately identifying the new certifying agent.
Traceability	▪ Traceability needs to be documented backwards, meaning that it should

	begin with export, proceed with processing, and end with raw material receipt. - To verify if goods are organic or conventional, a traceability check is performed. At every stage of production, preparation, and distribution, traceability must be assured in order to maintain the integrity of organic production. - Verification of the entire document should be done. The product must be tracked from the point of sale, via processing, storage, and finally back to the source. - Products intended for sale must be clearly marked as either organic or non-organic at every stage of handling, from the manufacturing facility to dispatch.
Mass Balance	- Forward Traceability need to be maintained in Mass Balance. i.e from Receiving of Raw material to dispatch of finished material should be recorded. - Determining the balance between the input and output is the goal of the mass balance check, which also aims to clearly verify the volumes of organic and non-organic products. - For a specific product and for a particular period of time, the mass balance should be done.

Please be aware that this is only a selection of essential requirements as an introduction. The operator, of course, has to learn about and meet all requirements of the NPOP standard.

7. Guidelines for Collection of non-cultivated material of plant origin / forest produces (Wild Harvest)

The following guidelines are based on the National Programme for Organic Production (NPOP). In order to be eligible for organic certification, Collection of non-cultivated material of plant origin / forest produces must be in compliance with the following standards.

Wild PLANT

WILD PLANT any plant or portion of a plant that is collected or harvested from a site (terrestrial or aquatic area) that is not maintained under cultivation or other agricultural management. Minimal agricultural practices such as re-seeding from or pruning of existing plants or the removal of non-native species along with the sustainable harvesting of the wild Plants may be allowed, otherwise, any other agricultural practices (irrigation, tillage, treatment, introduction of new plants, external seeds, use of shade cloth,...) require certification as a crop but not as wild Plants.

Forest produce" refers to non-cultivated plant and animal products, including wild plants, their parts, and products like honey, and medicinal herbs, that are sourced from forests.

NPOP states "The collection of wild plants and parts thereof, grown naturally, and in forest shall be certified as organic provided the collection areas have not received any treatment with products other than those authorized for use in organic production"

A person seeking an organic certification of wild scope must fulfil the following requirement:

- The collection of naturally grown wild plants and their parts in forests can be certified as organic, provided the collection areas have not been treated with any products other than those permitted for use in organic production.
- Organic operators should collect products only from within the boundaries of the clearly defined wild collection area.
- The collection area shall be at an appropriate distance from conventional farming so as to rule out pollution and contamination
- Organic collection management should ensure that in case of minor forest produce collection, law of the land should be applicable and should not exceed the sustainable yield of the collected species or otherwise threaten the local ecosystem.
- Furthermore, the harvesting/ gathering may not be destructive to the environment and must sustain the growth and production of the wild Plant. Unmanaged, untrained and uninformed harvesting of wild products without maintaining or improving the natural resources can disqualify the wild products from organic certification
- Products can only be certified organic if derived from a designated area for collection, clearly depicted in the map of the authorized area of collection by the forest department or state department, which is subject to inspection.

- The collection area should be at an appropriate distance from conventional farming, pollution and contamination.
- All records pertaining to production, storage, purchase and sales available and maintain all records at least five years beyond its creation.
- The operator managing the harvesting or gathering of the products shall be clearly identified and be familiar with the collecting area in question.
- Operator must inform the collectors for all the requirements in order to comply with NPOP regulation and require the collectors to sign statements (Collector agreement)that they have followed the instructions.

Examples of non-cultivated material of plant origin / forest produces may include, but are not limited to, the following:

1. Mushrooms
2. Herbs
3. Algae
4. Honey

ORGANIZATION

Certification of collection of non-cultivated material of plant origin / forest produces shall be considered as a project.

Collectors: individuals not independently subject to the control system, who collect wild plants in designated areas under conditions that allow their sale as organic products. They sell these exclusively to a Collection centre. Collectors are directly contracted by the Main operator and must sign a commitment to adhere to organic production rules.

Collection centres: These centres purchase and gather the plants/Forest Produces from the collectors and may also store behalf of Main operator. Typically, they are part of the Main operator's organization and are controlled as a secondary site.

Main operator: The main operator is the company or organization contracted with ZENITH and subjected to the control system, responsible for selling and usually exporting the collected plants or forest produces as organic. Typically, the main operator oversees the project and holds the certification. They may handle processing, storing, and packaging of the products either at their own premises or at another controlled site.

REQUIREMENTS CONCERNING THE AUDIT

- Any collection areas, collection centres, store houses, processing and/or packaging units and the Main operator shall be audited at least once a year.
- A certain number of collectors are also met and controlled to verify that practices employed during harvest correspond to those documented in the OSP.
- The wild crop harvest area shall be audited prior to harvest. It is checked that the species harvested are the intended species and the same as those mentioned on the application and in the OSP.

- Audit includes a review of the implementation of Wild plant/ forest produces. harvest procedures and training of the collectors.
- Border and buffer zones of the collection areas are also audited.

Recordkeeping System :

- Operators shall keep records of the period and location of the collection, the species concerned and the quantity of wild plants collected.
- Specify the date of the last application on the parcels and/or collection areas concerned of products, the use of which is not compatible with the organic production rules.
- The area of collection is properly identified on appropriate maps issued by the concerned Government Authorities. The map shall be large and distinct enough to reduce the risk of mixing up with non-certified production. However, wherever community rights are recognised under the Forest Rights Act, 2006, Gram Sabha letter can be considered for verification of collection area by the community.
- A detailed map of the collection region must be presented; collection places and critical areas (if any) must be marked on the map, including GPS coordinates for relevant places. Indicate the storage and production premises, harvest methods and land parcels and/or collection areas and, where applicable, premises where certain processing and/or packaging operations take place
- In case of minor forest produce collection, verify the relevant State/UT Government's law is applicable and should not exceed sustainable yield of the collected species or otherwise threaten the local ecosystem.
- The wild collector certified under NPOP possess the required permit for collection and transportation from the forest area.
- In case of collection of wild plants, the practical measures shall include any guarantees given by third parties(Authority in concern to Agriculture) which the operator can provide to ensure that the wild product harvested in defined wild area (Must include type of product harvested like fruits , leaves , etc ; designated area , Potential yield , Estimated harvested)and guarantee that product is harvested/collected in sustainable manner.
- Records and documentation: upto date & active collectors list, agreement or consent form between operator and collectors with roles and responsibilities duly signed to follow organic harvest standard and related instructions

8. Guidelines for Grower Group Certification

Introduction

In India, a significant number of farmers have small and marginal land holdings, which makes affording the cost of organic certification difficult. The organic agriculture movement cannot succeed without including these small and marginal farmers. Initially, organic standards and certification procedures were designed with individual farmers in mind. Over time, the potential for certifying small and marginal groups was recognized. This led to the certification of cooperatives or groups of producers within a specific geographical or social region, who collectively market their crops.

Today, Group Certification is widely popular and accepted among the Indian farming community. The Agricultural & Processed Food Products Export Development Authority (APEDA) under the Ministry of Commerce & Industry, Government of India, has established guidelines for certifying grower groups composed of small and marginal farmers.

Guidelines have been developed with reference to Chapter 5 of the National Programme for Organic Production (NPOP) and the NPOP Procedures 2024

Requirements for Certification of Grower Groups

Scope

Grower Group is an organized group of farmers who produce organic products and/or engage in organic production processes in accordance with the National Standards of Organic Production and NPOP and complies with Chapter 5 of this NPOP.

Basic requirements for Grower Groups

- The Grower Group shall be a registered legal entity in the form of,

a. Society registered under the Societies Registration Act, 1860 or relevant State Societies Act/Rules,

b. Farmers Producer Organization (FPO)/Farmers Producer Company (FPC) incorporated under the Companies Act, 2013, as amended from time to time,

c. Co-operative society.

- The producers in the group must apply similar production systems and the farms

should be in geographical proximity.

- The producers in the group must apply similar production systems and the farms should be in geographical proximity.
- A Grower Group shall comprise minimum 25 and maximum of 500 farmers,
- Farms with land holding of 4 ha and above can also belong to a group but will have to be inspected annually by the external Inspection and Certification Agency.
- The total area of such farms shall be less than 50% of the total area of the group
- Prerequisite for farmers registered in the Grower Group under NPOP. *(This requirement will be implemented after the formal operationalization of the Unique ID system by the Ministry of Agriculture & Farmers welfare)*
- In case the farmers are unable to run and operate its ICS, such farmers may enter into a contract with an external service provider to act as the ICS. Such service provider shall perform all duties and responsibility of the ICS under the NPOP and all provisions applicable to an ICS under the NPOP, including sanctions, shall mutatis mutandis apply to such external service provider.

Internal Control System (ICS) and its development

Internal Control System or ICS acts as the control system organized by the member farmers in the Grower Group to ensure that the NPOP requirements are met by the Grower Group

ICS is based on the concept of an Internal Quality System comprising of the following: -

- Implementation of the internal control system
- Internal Inspection
- Internal standards
- Risk assessment.

The Zenith shall evaluate by checking the ICS documentation, and staff qualifications and re-inspecting sample farmers and their farm and premises.

Requirements & Duties of ICS of Grower Group

- The ICS of the Grower Group shall have an office at the location or in proximity of the Grower Group. Certification Body shall conduct physical verification of the office of the ICS to ensure compliance with this requirement.
- The ICS must be established to manage the operations of the Grower Group and is responsible for ensuring compliance with the National Programme for Organic Production (NPOP) requirements.
- The ICS must have a clearly defined organizational structure, including an organizational chart outlining the roles and responsibilities of its personnel.
- The Grower Group should appoint qualified and experienced individuals to operate and maintain the ICS. The credentials and employment history of such personnel must be verified.
- The ICS must develop internal standards based on the NPOP framework, presented in the local language.
- There must be one internal inspector for every 50–60 farmers to ensure that 100% of the farmers in the Grower Group are inspected twice annually.
- Inspectors must be well-versed in the relevant organic standards to effectively conduct internal inspections.

- Information about each farmer—including the farmer's name, their father's or husband's name, farm geo-location, area, and crops cultivated—must be visibly displayed at the ICS office.
- The Grower Group must develop an ICS manual outlining the policies and procedures for the ICS and Grower Group operations. This includes guidelines for the admission and exit of members, as well as member agreements with the ICS. A model ICS manual format is available in the NPOP Procedures 2024.
- The ICS Manager, who will serve as the main point of contact, must reside within the geographical area of the Grower Group.
- A contracted service provider will assist with maintaining the ICS, including responsibilities such as training, coordination, certified produce marketing, and facilitation of certification by a Certification Body. The provider will also ensure that all necessary documentation is maintained at the ICS office.

ICS Personnel

The Grower Group shall have designated personnel for its ICS. All personnel of the ICS shall be preferably from within the Grower Group.

In case, the Grower Group engages an external service provider for running the ICS through a contractual arrangement, the internal inspectors should preferably be from within the Grower Group.

The ICS shall have following designated personnel:

- ICS Manager
- Approval Committee
- Internal Inspectors
- Field Officer
- Purchase officers
- Accounts/ record keeper
- Warehouse manager (If there are separate warehouses)

Conflict of Interest

ICS personnel must maintain impartiality and shall not engage in any activities that could compromise the integrity of the organic certification process. Any potential conflicts of interest must be disclosed in writing to the ICS. The ICS is responsible for addressing and resolving such conflicts effectively to uphold the credibility of the certification process.

Internal Approval

The ICS manager will have a defined procedure to approve or impose sanctions on the farmers in the group. All internal farm checklists are screened by internal approval staff with a special focus on the critical control points of risk / difficult cases.

The approval committee for providing internal certification status will check the

• Assessment of the internal inspector. If necessary, conditions will be set out for achieving compliance with the NPOP.

• The next competent person or committee must confirm the results of the internal inspection in an approval procedure.

Training of ICS Personnel and Farmers

- The ICS shall ensure that each internal inspector is trained annually by an external person/agency well versed in the NPOP requirements and organic processes.

- Each farmer needs to receive at least one initial advisory visit and training on organic farming and group certification requirements
- Besides, farmers should receive one regular training annually from central and state agencies responsible for promotion of organic farming.
- The date of the training, course content, list of participants, Videos and photographs will be documented.

Certification

Scope certificate of the Grower Group should be the actual location and address of the Grower Group and its ICS.

Trade

The Grower Group shall market the produce as a single entity.

Yield Estimates

Yields will be estimated for each crop for individual farmer in the group by the ICS. This activity should be carried out especially during harvesting and the estimate should be counter-checked during external inspection by the Zenith.

Procurement Process

For procurement from the farmers in the group, the ICS has to verify the organic status, compliance of the product procured, product reconciliation etc. The ICS has to maintain purchase record and issue a signed purchase receipt to the farmer. The procured products (bags) should be labelled as organic or in conversion as per the status.

Storage and Handling

The purchase or the warehouse manager during the handling of produce shall check the document to ensure the compliance with the National Programme for Organic Production (NPOP)

The following are the minimum requirement that shall be followed during storage and handling:

a. Identification of the organic product at all stages of product flow during transition.

b. Segregation of organic products from in-conversion products.

c. Fumigation of containers, irradiation/ionization, etc. are prohibited.

d. The location in the warehouse during storage must be labelled as ‘organic’ or ‘in-conversion

NON-COMPLIANCES AND SANCTIONS

In case of non-compliance, the ICS shall take corrective or mitigating measures.

- Procedures for the implementation of sanctions will be defined in case of non compliance.
- Sanctions have to be documented (list of farmers issued sanctions, documentation of identified non-conformities in the files).
- Farmers who have used prohibited inputs on their farms must undergo the full conversion period (if they remain in the Grower Group). In such cases, it is required to be verified whether such farmers have already delivered produce and whether such “now no longer certified” produce has been mingling with other produce. If

this has been the case, the Certification Body needs to be notified immediately and the mingled

- produce to be removed from the supply chain.ICS has right, If required, a minimal pecuniary penalty, (upto Rs. 5000/-) may be imposed on farmers for violations of NPOP requirements. The acreage of the farm holdings of the concerned farmer shall be taken into consideration while imposing the pecuniary penalty. However, this amount may be adjusted by the ICS in case of full compliance during the sanction period.

Documents and records of the Grower group

The internal control system (ICS) of the Grower group will maintain the following documents/records

- Registration details for legal entity
- Date of registration
- Organizational structure
- Complete details of the grower group members including name, address (location), date of joining the group, land details (organic, in conversion, non-organic), area, crops grown, conversion status, yield estimates, details of collection centres, purchase centres, storage area, previous certification details etc.
- Application forms of the farmers
- Contract with the respective farmers
- Exit forms covering reasons for exit.
- Updated list of farmers with date of last update
- Location map of the Grower group depicting the location of the production area/farms.
- ICS Manual covering detailed operating procedures
- Internal standards in local language under the framework of NPOP and package of practices
- Contract with Service provider (if applicable)
- Farm diaries (available with the respective farmers)
- Internal inspection records, formats of checklist and report with date and version
- Date of internal inspections (start and end date)
- Internal inspection checklist and reports with name of internal inspectors, date etc.
- Findings of internal inspections
- Report of External inspection conducted by the Certification body
- Training records comprising of training schedule, dates of training, list of participants, attendance sheet, course content, training module including pictorial graphics, training videos, trainer, photographs, video etc
- Sanction Catalogue
- List of sanctions imposed in case of non-compliance by farmers.
- Must maintain all documentation of the group members and facilities, including an ICS Manual, OSP, production plans, materials used and rate of applications, harvest records, contractual agreements with each group member, purchase and distribution of farm inputs including plant reproductive material by the group and internal inspection reports
- When appropriate, operators are required to retain signed statements from all suppliers verifying that no genetically engineered products were supplied.

The ICS Manual (Documented Policies and Procedures) must include, but are not limited to the following points:

- **Organization Chart:** must provide a meaningful description of the group's structure and functioning of the ICS(how the various duties are divided among the ICS staff and to identify the structure among personnel).
- **Responsible Person Activities:** Name, address and contact person of the legal entity applying for certification, the personnel responsible for overseeing and implementing the ICS structure, and all site managers responsible for the day-to-day compliance.
- **Activities, Policies and Agreement:** Must include a description of the sub-units and facilities, farming practices, materials used and rates of application, harvest records, contractual arrangement with each individual member to meet the requirements specified for compliance to the group's internal standard and specific standard regulation, and internal inspection reports. The ICS Manual shall reflect the group's characteristics, internal policies, and procedures employed by the group.
- **Production system Overview:** Provide a general overview of the production system of group members, Organic/Non-Organic/Transition Crop details including, but not limited to, structure and size of group members (average, smallest and largest sub-unit), crops and common farming methods.
- **New Member acceptance/Registration of the members:** Describe procedures for accepting new members into the producer group operation and registration of the member , including initial inspection and compliance determination or, where appropriate, the approval of new production units or new activities of existing members upon the approval by the ICS manager on the basis of the internal inspection report
- **Conflicts of interest:** Describe measures to protect against potential conflicts of interest and protect internal control system personnel from retribution
- **Field Activities:** Description of all the steps from Sowing until final sale. This description should include Sowing , harvest , Storage, post-harvest handling procedures, logistics, collection, sorting, labeling, and packaging until final sale. All ICS personnel and facilities involved in the processing and storage of organic product must also be included.
- **Shared Resources:** Describe how shared resources, including production practices and inputs, are procured and provided to all producer group members and personnel;
- **Internal Inspection:** Include the annual internal physical on-the-spot inspections of each member of the group, and any additional risk-based inspections, in any case scheduled by the ICS manager and conducted by ICS inspectors;
- **Training of ICS personnels along with the assessment**
- **Record-keeping (includes Financial Traceability), Audit Trail and Mass Balance: Describe the system of records used to demonstrate compliance, including traceability and mass-balance audits**
- Internal Organic Standards based on applicable NPOP standard
- A written and signed **contractual agreement** with each member and the group

The following group member information must be collected and documented:

— General information including the name of person(s) responsible for production, Father/Husband name , identification (Code number) , address (or village), GPS Coordinate , date of registration, date of the beginning of the conversion period and yield estimates and any other details to locate the group member, telephone numbers, if the group organizes more than one production units that must also be clearly enlisted.

— Information on the agricultural production area including registered fields and facilities under the group member's management, including the non-organic/Transition fields, crops under the group's common marketing and any other crops produced by the group member for other purposes (e.g. for own consumption or local markets), cultivation practices and the management history (date of last application with prohibited substances) of each field, and the total area and area of crop's to be approved for the group's common marketing.

— A field map must be provided to show where the respective fields are located to ensure that internal or external inspectors can find them. The fields must be numbered according to the number represented in the group member's field register where the field management history is also documented.

— A risk assessment must address whether there are any potential negative impacts from neighbouring fields which are not managed organically.

Additionally ICS must keep below mentioned records as well in Compiled manner :

- Name and identification (code number)
- Contact details
- Date of registration
- Total land surface under the management of the member and whether it is part of an organic, in-conversion or non-organic production unit;
- Information on each production unit and/or activity: size, location, including a map where available, product, date of the beginning of the conversion period and yield estimates;

Internal Inspection Report(to be counter signed by ICS inspector and group member) and must be submitted within a timeframe specified in the ICS procedure to the ICS Manager, must include below mentioned additional information:

— The name of the member and the location of the production unit or premises, including purchase and collection centers where the activities performed

— The findings of the inspection;

— The audit scope/perimeter (i.e. NPOP, NOP, EU, COR, USCOEA, as applicable);

— The date of issue of the report;

— The name of the internal inspector;

- **Traceability records, including information on the quantities, on the following activities, where relevant must be maintained:**

(i) purchase and distribution of farm inputs including plant reproductive material by the group; (ii) production including harvest; (iii) storing; (iv) preparation; (v) delivery of products from each member to the joint marketing system; (vi) placing on the market of products by the group of operators;

9. Derogation to Conversion Period

Duration of Conversion Period

i. Annual and Biennial Crops

For **annual and biennial crops**, plant products may be certified as organic only when the requirements outlined in NPOP Standards have been fully met for a **minimum of two (2) years** of organic management **prior to sowing (i.e., the start of the production cycle).**

ii. **Perennial Crops** (excluding grasslands, pastures, and meadows)

For perennial crops, **the first harvest may be certified organic after a minimum of three (3) years of compliance** with organic management practices as prescribed under NPOP Standards.

iii. **Extension or Reduction of Conversion Period**

Zenith may decide to extend or reduce the conversion period in specific cases based on:

- The past usage and status of the land, and
- Prevailing environmental conditions.

Derogation to the Conversion Period

In exceptional cases, a previous period may be considered equivalent to the full conversion period for both annual and perennial crops, provided documentary evidence demonstrates that the required organic standards have been met continuously for at least three (3) years.

A. Eligible Categories for Derogation

i. Land Certified under the Participatory Guarantee System (PGS):
The land has been certified under the PGS, implemented by the Ministry of Agriculture & Farmers Welfare, for a continuous period of three (3) years immediately prior to the application for derogation.

- No sanctions should have been imposed on the applicant during this period in relation to non-compliances affecting organic integrity.

ii. **Land Located in Hilly Areas of Himalayan States/UTs:**
The land must be situated in the Hilly Areas of the following regions:

- Jammu & Kashmir
- Ladakh
- Himachal Pradesh
- Uttarakhand
- North Eastern Region

These areas must be notified by the State/UT as natural and not treated with substances prohibited under the NPOP for a continuous period of three (3) years.

Note: "Hilly Area" refers to any area with altitude >600 meters above mean sea level or an average slope ≥30 degrees as per the National Building Code.

B. Required Documentary Evidence

I. For PGS-Certified Land:

- A valid PGS certificate.
- Confirmation of the certificate's validity and any sanctions, obtained from the **National Centre for Organic & Natural Farming (NCONF).**

II. For Land in Notified Hilly Areas:

- A copy of the **State/UT notification** declaring the area as natural and untreated.
- A **geo-referenced map** showing the location of the land for which derogation is sought.

10.Shifting of Operators or Farmers

Procedure for Changing the Certification Body (CB) on Tracenet :

i. **Application for No Objection Certificate (NOC):**
An Operator intending to change their Certification Body must apply for a No Objection Certificate (NOC) through Tracenet.

- The application must be submitted **at least 45 days prior to the expiry** of the existing scope certificate.
- At the time of application, the Operator must:
    - Ensure all dues to the current Certification Body are cleared.
    - Submit corrective actions for any outstanding non-compliances, if applicable.

ii. **Issuance of NOC:**
The existing Certification Body must issue the NOC **within three weeks** from the date of application, provided:

- All dues have been settled, and
- All pending non-compliances have been addressed and closed by the Operator.

iii. **Transfer of Records:**
Upon issuance of the NOC, the Operator's file and related reports will be **transferred online** to the new Certification Body through Tracenet.

iv. **Validity of Certification:**
The Operator must hold a **valid scope certificate** during both the issuance of the NOC and registration with the new Certification Body.

v. **Restriction After Expiry:**
If the scope certificate has **already expired**, the Operator **will not be permitted** to register with a new Certification Body, even if an NOC has been issued.

vi. **Closure of Non-Conformities by New CB:**
The new Certification Body must ensure that all non-conformities previously reported by the former Certification Body are properly addressed and closed **prior to issuing a new scope certificate**.

Shifting of Farmers

i. A farmer or group of farmers within a Grower Group may shift to another Grower Group, either under the same or a different Certification Body, if they choose not to continue with their current Grower Group.

ii. Farmers intending to shift may apply for a **No Objection Certificate (NOC)** from the Certification Body at the **beginning of a new season**, to:

- Transfer to another Grower Group within the same geographical area, or
- Form a new Grower Group with other farmers within the same geographical area.

iii. In such cases, the concerned farmer(s) must submit a **formal request for issuance of NOC via Tracenet** to their Certification Body.

- Upon receiving the request, the Certification Body must **verify** the farmer's details, including past records, sanctions (if any), as recorded in the Internal Control System (ICS).
- The Certification Body shall **dispose of the NOC application within 30 days** from the date of receipt.

iv. If the Certification Body fails to act on the NOC application within 30 days, the application shall be **automatically escalated to APEDA** through Tracenet.

- APEDA will conduct the necessary verification, and if satisfied, will **instruct the Certification Body to issue the NOC**.

v. In the event of rejection of a farmer's NOC application by the Certification Body, the applicant may **appeal the decision** before the NAB Sub Committee.

- Upon review and verification, if the appeal is found valid, **APEDA will direct the Certification Body to issue the NOC**.

vi. **APEDA's decision in such matters shall be final**, and the Certification Body must comply within **one week** from the date of receipt of the directive.

vii. Failure by the Certification Body to dispose of an NOC application within 30 days will be treated as a **non-conformity under Regulation 6.1.4 of the NPOP**.

viii. If farmers are **unable to independently operate the Tracenet software**, the Certification Body shall **facilitate the application process on their behalf**, charging a **reasonable fee** for the service.

- **In case of NOC , Zenith will inform Previous CB and APEDA via Mail before conducting inspection.**

Procedure To change accredited certifying agents, certified organic operations must:

1. Submit an application for certification
2. Submit a complete OSP for the scope(s) of certification requested.
3. Pay fees according to the fee schedule
4. Maintain their current certification, including submitting annual updates, allowing timely inspections, and paying all required fees to the current certifying agent.
5. Submit an application for certification
6. Submit a complete OSP for the scope(s) of certification requested.
7. Pay fees according to the fee schedule
8. Maintain their current certification, including submitting annual updates, allowing timely inspections, and paying all required fees to the current certifying agent.
9. ZENITH will notify the applicant of their obligation to maintain their current certification throughout the new certification process in order to sell, label or represent products as organic during the process of changing to the new certifying agent.
10. ZENITH will conduct a complete review of the application and OSP for compliance with the organic regulations.
11. ZENITH will schedule and conduct an on-site inspection. An inspection is required prior to the issuance of a new certificate.
12. ZENITH will issue a new certificate only after the applicant is determined to be in compliance with the organic regulations.

11. Policy and procedure for Record keeping

Scope	Recordkeeping Details
Crop Production	➢ Records must be maintained for not less than 5 years beyond their creation. Recordkeeping system must includes but are not limited to : ➢ Before the first inspection takes place, the farm must present an organic management plan to ZENITH; this plan must be updated annually ➢ A farm diary must be kept, recording the main activities (Right from sowing until dispatch/Sale) on each plot ➢ Financial records ((e.g. purchase orders, contracts, invoices, receipts, report of commodities, settlement sheets, or sales journals) ➢ Complaint log ➢ Buffer harvest records – if buffer crops are used ➢ Identification of product organic, in-conversion, Conventional status in all production /sale or dispatch record ➢ Lot numbering system/ Use of lot numbers ➢ Seed Packets/Input Packet (Labels), Seed Search Evidence. ➢ Keep records proving the need for the use of authorized products, including the date or dates on which each product was used, the name of the product, its active substances, the amount applied, location of such use, the crop and parcels concerned, and the pest or disease to be controlled ➢ Keep records of any other external input used on each parcel and, where applicable, keep available documentary evidence on any derogation from production rules
Wild Collection	➢ Operators shall keep records of the period and location of the collection, the species concerned and the quantity of wild plants collected. ➢ Specify the date of the last application on the parcels and/or collection areas concerned of products, the use of which is not compatible with the organic production rules. ➢ A detailed map of the collection region must be presented; collection places and critical areas (if any) must be marked on the map, including GPS coordinates for relevant places. Indicate the storage and production premises, harvest methods and land parcels and/or collection areas and, where applicable, premises where certain processing and/or packaging operations take place

	➢ In case of collection of wild plants, the practical measures shall include any guarantees given by third parties(Authority in concern to Agriculture) which the operator can provide to ensure that the wild product harvested in defined wild area (Must include type of product harvested like fruits , leaves , etc ; designated area , Potential yield , Estimated harvested)and guarantee that product is harvested/collected in sustainable manner.
Grower Group	▪ Must maintain all documentation of the group members and facilities, including an ICS Manual, OSP, production plans, materials used and rate of applications, harvest records, contractual agreements with each group member, purchase and distribution of farm inputs including plant reproductive material by the group and internal inspection reports The ICS Manual (Documented Policies and Procedures) must include, but are not limited to the following points: ▪ **Organization Chart:** must provide a meaningful description of the group's structure and functioning of the ICS(how the various duties are divided among the ICS staff and to identify the structure among personnel). ▪ **Responsible Person Activities:** Name, address and contact person of the legal entity applying for certification, the personnel responsible for overseeing and implementing the ICS structure, and all site managers responsible for the day-to-day compliance. ▪ **Activities, Policies and Agreement:** Must include a description of the sub-units and facilities, farming practices, materials used and rates of application, harvest records, contractual arrangement with each individual member to meet the requirements specified for compliance to the group's internal standard and specific standard regulation, and internal inspection reports. The ICS Manual shall reflect the group's characteristics, internal policies, and procedures employed by the group. ▪ **Production system Overview:** Provide a general overview of the production system of group members, Organic/Non-Organic/Transition Crop details including, but not limited to, structure and size of group members (average, smallest and largest sub-unit), crops and common farming methods. ▪ **New Member acceptance/Registration of the members:** Describe procedures for accepting new members into the producer group operation and registration of the member , including initial inspection and compliance determination or, where

	appropriate, the approval of new production units or new activities of existing members upon the approval by the ICS manager on the basis of the internal inspection report ▪ **Conflicts of interest:** Describe measures to protect against potential conflicts of interest and protect internal control system personnel from retribution ▪ **Field Activities:** Description of all the steps from Sowing until final sale. This description should include Sowing , harvest , Storage, post-harvest handling procedures, logistics, collection, sorting, labeling, and packaging until final sale. All ICS personnel and facilities involved in the processing and storage of organic product must also be included. ▪ **Shared Resources:** Describe how shared resources, including production practices and inputs, are procured and provided to all producer group members and personnel; ▪ **Internal Inspection:** Include the annual internal physical on-the-spot inspections of each member of the group, and any additional risk-based inspections, in any case scheduled by the ICS manager and conducted by ICS inspectors; ▪ **Training of ICS personnels along with the assessment** ▪ **Record-keeping (includes Financial Traceability), Audit Trail and Mass Balance: Describe the system of records used to demonstrate compliance, including traceability and mass-balance audits** ▪ Internal Organic Standards based on applicable NPOP standard ▪ A written and signed **contractual agreement** with each member and the group **The following group member information must be collected and documented:** — General information including the name of person(s) responsible for production, Father/Husband name , identification (Code number) , address (or village), GPS Coordinate , date of registration, date of the beginning of the conversion period and yield estimates and any other details to locate the group member, telephone numbers, if the group organizes more than one production units that must also be clearly enlisted. — Information on the agricultural production area including registered fields and facilities under the group member's management, including the non-organic/Transition fields, crops under the group's common marketing and any other crops produced by the group member for other purposes (e.g. for own consumption or local markets), cultivation

	practices and the management history (date of last application with prohibited substances) of each field, and the total area and area of crop's to be approved for the group's common marketing. — A field map must be provided to show where the respective fields are located to ensure that internal or external inspectors can find them. The fields must be numbered according to the number represented in the group member's field register where the field management history is also documented. — A risk assessment must address whether there are any potential negative impacts from neighbouring fields which are not managed organically. **Additionally ICS must keep below mentioned records as well in Compiled manner :** ▪ Name and identification (code number) ▪ Contact details ▪ Date of registration ▪ Total land surface under the management of the member and whether it is part of an organic, in-conversion or non-organic production unit; ▪ Information on each production unit and/or activity: size, location, including a map where available, product, date of the beginning of the conversion period and yield estimates; **Internal Inspection Report(to be counter signed by ICS inspector and group member) and must be submitted within a timeframe specified in the ICS procedure to the ICS Manager, must include below mentioned additional information:** — The name of the member and the location of the production unit or premises, including purchase and collection centers where the activities performed — The findings of the inspection; — The audit scope/perimeter (i.e. NPOP, NOP, EU, COR, USCOEA, as applicable); — The date of issue of the report; — The name of the internal inspector; **Traceability records, including information on the quantities, on the following activities, where relevant must be maintained:** (i) purchase and distribution of farm inputs including plant reproductive material by the group; (ii) production including harvest; (iii) storing; (iv) preparation; (v) delivery of products from each member to the joint marketing system; (vi) placing on the market of products by the group of operators;

Handling recordkeeping	All certified processing or handling facilities must keep records to show that organic integrity is maintained throughout the process at the facility. These records must show: ➢ Certification for organic ingredients; ➢ A system for tracking products from the point of arrival through processing, storage, and sales, including lot numbers, production logs, inventory, records for storage and sales, cleaning, and pest control; ➢ Recipes that list each ingredient's percentage (apart from salt and water) in each product; ➢ A product flow chart that shows the steps involved, including the storage of ingredients and packaging, transportation of goods in and out of the process, processing of the final product with all inputs (such as steam or water), and storage of ingredients and packaging; ➢ All non-organic ingredients have to conform to organic standards ➢ There are no pesticides or other prohibited materials in the packaging; ➢ Inventory management and storage meets organic regulations; ➢ Sales tracked through production to specific ingredient lots or deliveries; ➢ If applicable, documentation proving that incoming and outgoing transportation was clean prior to the presence of organic product; ➢ Pest control that follows the order of activities defined in the Pest Management section. ➢ Keep available documentary evidence on authorizations for the use of non-organic agricultural ingredients for the production of processed organic food ➢ Keep records of the use of products(External Input/Own Prepared/Any input), including the date or dates on which each product was used, the name of the product, its active substances and the location of such use ➢ In case of production of composite products, complete recipes/formulae showing the quantities of input and output shall be kept available

*The visiting inspector shall sign the verified documents.

12. Policy on Certification and Use of Certification Mark with Respect to Chain of Custody

Zenith maintains strict control over the issuance of certificates and the use of its certification mark to ensure the **integrity and traceability** of certified products.

Accordingly, the CB **shall not issue any certificate or license to use its certification mark for any product** unless it has obtained **clear and documented assurance of an unbroken chain of custody** throughout the production, processing, and handling of the product.

Specifically:

- Each step in the production and supply chain must be **certified by accredited inspection or certification agencies** operating under the **National Programme for Organic Production (NPOP)**.
- All activities must comply with the **National Standards for Organic Production** as specified under NPOP.
- The CB is responsible for verifying that **all operators in the chain (including producers, processors, handlers, and traders)** are certified under NPOP or recognized equivalent standards.

This policy ensures that only products with **fully verified and certified supply chains** are granted certification, thus protecting the credibility of the certification system and the confidence of consumers.

INTRODUCTION – Use of the India Organic Logo

1. Meaning of the India Organic Logo
   The "India Organic" Logo on a product signifies that the product has been certified as organic by a recognized Certification Body under the National Programme for Organic Production (NPOP).

2. Eligibility for Use
   All products certified under NPOP are eligible to use the India Organic Logo, provided they meet the conditions specified in the regulations.

3. Basis for Granting License
   The license to use the India Organic Logo is granted based on full compliance with the NPOP standards.
   It confirms that the product has been produced, processed, packed, and transacted in accordance with NPOP requirements.

4. Ownership and Governance
   The India Organic Logo is a registered trademark owned by the Government of India.
   Only certified producers, manufacturers, processors, and exporters are authorized to use the logo, and its use is strictly governed by the regulations notified under the NPOP.

Use of the India Organic Logo: Authorized Users

Export as "Organic Product"

- A product can only be **exported as "Organic"** if it is **produced, processed, and packed** under the **certification trademark** issued by Certification Bodies authorized by the **National Accreditation Body (NAB)** under the **NPOP**.

Ownership of the Logo

- The **Ministry of Commerce & Industry** is the **sole and exclusive owner** of the **India Organic certification trademark**.
- Certification Bodies operate as **agents** of the Ministry under an **Agency Agreement**.

Certification Bodies' Role

- When a Certification Body grants certification, it acts **on behalf of the Ministry**, meaning the certification is **ultimately conferred by the Ministry of Commerce & Industry**.

Revocation of License

- A license to use the certification mark may be **revoked** if the licensee:

a. **Challenges the validity** of the India Organic trademark;
b. **Disputes ownership** of the trademark by the Ministry;
c. **Takes actions** that harm or impair the Ministry's rights or goodwill associated with the trademark.

Nature of the License

- The license to use the India Organic logo:
  - Is a **privilege**, not a legal entitlement;
  - **Does not grant ownership or rights** over the trademark;
  - **All benefits and goodwill** from its use belong solely to the Ministry;
  - Is **subject to all rules and restrictions** under the NPOP regulations.

Register of Licensees

- The **National Accreditation Body (NAB)**, through the Certification Bodies, will **maintain a register** of all **licensed/authorized users** of the India Organic logo.

Applying for a License :
Submission of Application
- Applications must be submitted to the Zenith using **Form 1**.

Inspection and Testing Scheme
- Applicants must include details of any **inspection and testing schemes** they follow (or plan to follow) to control product quality.

Signing the Application
- Applications must be signed by:
  - The individual (if applying personally),
  - The proprietor, partner, or managing director (if a firm),
  - Or a **duly authorized signatory**.
  - Name and designation of the signer must be clearly written.

Acknowledgment and Priority
- Each application is **numbered** upon receipt and **acknowledged** in order of submission.

Additional Information

- Zenith may request **additional documents or information**.
    - Failure to provide them within the given time may lead to **rejection**.

Pre-License Assessment

Before granting the license, Zenith may:

- **(a)** Ask for evidence that the product/process **complies with NPOP/NSOP standards**.
- **(b)** Verify that a **routine inspection and testing scheme** is in place.
- **(c)** Conduct **inspections** of farms, processing units, labs, warehouses, etc.
- **(d)** Direct sample submission to **approved labs** (testing cost to be borne by applicant).
- **(e)** Suggest changes or improvements in the applicant's **production processes**, if necessary.

Grant of License

Issuance Criteria

- If the Zenith is satisfied with the applicant's **skill, resources, compliance, and conduct**, it will grant a license using **Form 2**.

Conditions:

- **(a)** The licensee can use the Certification Trademark **only on approved products** and **in line with NPOP standards**.
- **(b)** If the license is **withdrawn**, the license and certificate must be returned; no compensation will be provided.
- **(c)** Use of the trademark must follow the **official regulations**.
- **(d)** If the license was previously revoked due to misuse or false info, reapplication is **barred for up to 1 year**, depending on the case.

Validity

- Licenses are granted for **1 year**.
- A declaration from the licensee is to be submitted on **Form 3**.

Amendments

- Zenith may **change license terms** with **one month's notice** during the license period.

Rejection Procedure

- If the application is likely to be rejected, the applicant must be given a **chance to be heard**, either personally or through an authorized representative.

Expiry

- The license **automatically expires** at the end of its valid period.

Conditions of a License

Usage of Certification Trademark

- Must be clearly visible on the product, packaging, or test certificates.
- Used only on approved items (types, grades, sizes, etc.).
- Manner of use must be pre-approved by the Certification Body.

Public Claims

- Only valid license holders can advertise or promote their products as certified.
- Unauthorized claims are strictly prohibited.

Quality Control

- Licensees must maintain a testing and inspection system to ensure ongoing compliance with NPOP standards.
- Complete records must be maintained and made available for inspection.

Suspension or Cancellation of License

- **Grounds for suspension/cancellation:**
    - Product or process fails to meet NPOP standards.
    - Unauthorized or incorrect use of the Certification Trademark.
    - Non-cooperation with Zenith.
    - Violation of any license conditions.
- **Procedure:**
    - 14-day notice period before suspension or cancellation.
    - Licensee may submit an explanation or request a hearing.
    - Zenith to respond within 14 days after notice or hearing.
    - Upon cancellation:
        - Licensee must stop using the trademark immediately.
        - Any marked stock must have the mark removed, defaced, or erased.

Public Notification

- Zenith will inform the licensee in writing and publish the suspension/cancellation.

Temporary Halt of Marking

- **If production cannot meet standards or equipment fails:**
    - Licensee must stop marking and inform the Zenith.
    - Marking can resume once issues are resolved and reported.
- **Zenith can also order a stop if compliance is in question.**

Communication

- All major decisions (e.g., suspension, resumption) are communicated in writing via registered post.

Special Inspections

- Requested inspections are chargeable to the applicant/licensee.
- Charges are set by the Zenith (Charges will be same as of Annual Inspections).

Withdrawal of Standards

- **If a norm is withdrawn and not replaced:**
    - The license is automatically cancelled.
    - Any unexpired license fee may be adjusted/refunded.

Sampling Procedure

- Notice is generally given to applicants, not required for licensees.
- Samples must be taken in presence of applicant/responsible person.
- Duplicate samples and joint sealing if requested.
- Seal impressions and sample IDs are recorded in reports.
- A receipt is provided for the samples.

Sampling Locations

- Samples may be drawn from:
    - Godowns
    - Agents' premises
    - Products in the open market

Annual Inspection

- At least one inspection per year is mandatory per license.

Inspection Reports

- A detailed report must be prepared for every inspection conducted.

Use of Certification Trademark

Authorized Use Only

- The Certification Trademark can only be used by the licensee as specifically authorized by the Zenith.

Product-Specific Usage

- A license granted for a particular product must not be used for any other product.
- The license is product-specific and limited strictly to what is mentioned in the license agreement.

Obligations of the Applicant (Licensee)

Upon receiving the license to use the Certification Trademark, the applicant shall:

a. Comply with Regulations

• Adhere to all license requirements and NPOP regulations, including any amendments.

b. Accurate Representation

• Claim the license only for the specific capability, product, or process it is issued for.

c. Avoid Misuse

• Not misuse the license or make any misleading statements about its authority.

d. Approval of Usage Format

• Submit the proposed usage format of the license (e.g., labeling, advertising) to the Zenith for approval.

e. Discontinue on Suspension/Termination

• Immediately stop using the license and withdraw all references upon suspension or termination.

f. Allow Inspections

- Permit access to Certification Body Inspectors for audits, assessments, or investigations.
- Share full details of corrective actions taken on complaints or issues.
- Provide access to relevant records and documents.

g. Maintain Operational Status

- Demonstrate continued operations under the license.
- Inform the Zenith of any operational break exceeding 3 months.
- Breaks over 6 months may result in cancellation. A fresh application and inspection will be required for re-licensing.

h. Settle Dues

- Pay all applicable fees to the Zenith as prescribed, even during license suspension or inactivity.

Surrender of License

- A licensee may **voluntarily surrender** the license **at any time** by submitting a **written request** to the Zenith.
- Upon surrender, the licensee must **return the original license** along with **all related documents** to the Zenith.

Misuse of License

i. A licensee is considered to have **misused the license** if they continue to use the **India Organic Certification Mark** after any of the following:

- The **accreditation** under NPOP has been **surrendered, suspended, withdrawn, or terminated**.
- The **license** itself has been **surrendered, suspended, or cancelled**.
- The licensee has **not implemented changes** as directed by the Zenith.

ii. If a licensee misuses the license or the India Organic mark, they may face **legal action** under applicable laws

13. Transaction Certificate - Policy and procedures for issue of Transaction certificate (TC) (NPOP 4.4.4.2)

I. A product will be allowed to export as "Organic Product" only when accompained by a Transaction Certifiicate (TC) issued by NPOP accredited certification body.

II. The ZENITH shall issue Transaction Certificates for all the organic transactions through TRACENET SYSTEM.

III. Operator who are involved in transaction of organic products either in the domestic or export market shall mandatorily apply for Transaction certification on Tracenet with necessary supporting documents includes Transaction invoices, Shipping bills, Packing list, Source TC, Bill of lading, mode of transport, product details, quantity, valid scope certificates upto supplier, buyer/importer details with address, country of destination, procurement document, Analysis report as per case (mandatory for EU Export Consignments) and other relevant fields required. ZENITH may ask for a third-party analysis report of the product to be exported prior to issuance of transaction certificate (All EU consignments shall require mandatory third party residue testing report).

IV. In case the organic product is intended for sale in the domestic market only, the TC shall be taken mandatorily till final packing to consumer product in the supply chain. Thereafter, the stock shall be closed as domestic consumption.

V. Transaction Certificates will be issued on Tracenet in the prescribed format after the certified operator has provided all the required documents. Operator can source the materials directly from the created lot for TC application.

VI. ZENITH shall take reasonable measures (outlined below in bullets) to verify that the information provided is correct and all the documents have been submitted in original before issuance of the Transaction Certificate. Transaction certificate will be issued against the lot or batch quantity requested and approved by ZENITH. The transaction will be allowed within the prescribed time period guided by APEDA.

Measures:

- Supplier scope certificate (original Transaction certificate(s)) of purchased product that has been sourced and certified by another accredited Certification Body shall be verified before issuance of the Transaction Certificate. suppliers organic status pertaining to the consignment, stock accuracy, TC and accompained document accuracy, anaysisi report complaince, wherever necessary supplier CB will contacted for any clarification / information required (like irregularity/ infingement)/ analysis reprot.
- In case of open major non-compliance, operator will not be eligible of transaction certificate, status of non compliance and TC holding reason will be notified to concerned exporter/Importer accordingly. Hence operator must be ensured that there should not be any open non-conformity before applying Transaction certificate.
- complaint status if any , any conditions / restrictions imposed on operator will be verified
- Analysis report consistency will be verified
- Product reconciliation (in out balance)
- Importing countries: Verify recognition agreemnt and export requirements compliance, compliance with the organic standards of that Country
- In case of imported ingredients : traceability documents of the imported ingredients along with country of origin, percentage of composition of that ingredient and certification will be verified
- In case of re-export of imported ingredients/ value added products: must be as per

importing country's regulations, verify accuracy and curent validity of accompained documents including organic scope and transaction certificates issued by the Certification Body under NPOP or by the Certification Body of the importing Country as per their regulation where in there is a recognition agreement for organic products.

VII. The TC will be issued within the timeline prescribed under NPOP. Final quantity will be reconciled and adjusted after reduction of approved quality for sale through successive TC. ZENITH shall not delay issuance of the transaction certificate after receipt of all documents and verifying that they are in order.

Timelines for issuance of Transaction certificate

Following timelines shall be followed for issuance of Transaction certificate. Below timelines are subject to submission of complete documents and will not be applicable in cases where physical verification is required, based on risk analysis. Wherever applicable, the original Transaction certificate(s) of a purchased product that has been sourced and certified by another Certification Body shall be verified before issuance of the Transaction Certificate.

a) TC from grower group/ individual producer to trader/processor: **within 5 working days**

b) TC between processor / trader & processor/trader/retailer (domestic transactions): **within 3 working days**

c) Export TC: **within 7 working days.**

Import and Re-Export of Organic Products

Consignment :

Consignment shall mean a quantity of product(s) under one or more Harmonized System codes, as notified by the DGFT, covered in a single transaction certificate issued by a Certification Body, conveyed by the same means of transport for export of organic products.

Import of Organic Products :

Import of organic products into India shall be **permitted only if** the product is certified in accordance with the **National Programme for Organic Production (NPOP)** by a Certification Body duly accredited under the NPOP framework.
Notwithstanding the above, organic products or ingredients imported from countries that have entered into a **Mutual Recognition Agreement (MRA)** with India—wherein **equivalence of organic standards** between the NPOP and the exporting country's standards has been formally recognized—**shall not be required to undergo re-certification under NPOP** upon import into India.

This exemption shall apply **only if the imported products comply** with the applicable provisions of the **domestic laws, rules, and regulations** governing organic products in India.

Use of Imported Organic Ingredients :

Imported organic ingredients, in accordance with the conditions outlined under **Regulation 4.6**, may be used for the **manufacture of multi-ingredient organic products in India**, intended for **re-export**, subject to compliance with the organic regulations of the importing country.

Prior approval shall be obtained from the Certification Body **before the import** of organic ingredients and **prior to their use** in the manufacturing of a multi-ingredient organic product.

ZENITH shall verify that:

- **Only approved imported ingredients** are used, and
- **The quantity and percentage** used are within the approved limits. Where necessary, based on risk assessment, the Zenith may conduct **testing** of the imported ingredients to ensure compliance.

For such products, the **final label** shall clearly declare the **imported organic ingredients separately**, listed beneath the product composition.

Complete **traceability documentation** for the imported ingredients shall be maintained by both the Certification Body and the Operator. This must include:

- **Country of origin**,
- **Percentage composition**, and
- **Organic certification details**.
  These records must be readily available for **inspection** as required.

Re-export of Products Made from Imported Organic Ingredients :

The **re-export** of products manufactured using imported organic ingredients shall be in accordance with the **regulatory requirements of the importing country**. Both **exporters** and **Certification Bodies** must ensure full compliance with the **organic standards** applicable in the destination country.

In the case of countries having a **Mutual Recognition Agreement (MRA)** with India, the **re-export of value-added organic products** containing imported organic ingredients shall be conducted **within the scope of such agreements**.

Imported organic products intended for re-export must be accompanied by:

- **Valid organic scope certificates**, and
- **Transaction certificates**,
  issued either by an NPOP-accredited Certification Body or, in the case of MRAs, by the **Certification Body of the exporting country**, in accordance with their regulations.

Necessary verification checkpoint for import/Export :

- Imported/Exported organic products treated with ionizing radiation or a substance prohibited by the NPOP organic regulations may not be sold, labeled, or represented as organic or organically produced or handled.

- Imported agricultural products may be subject to ionizing radiation, which is also prohibited for use in organic production and handling. Reviewers and Inspectors are instructed to review the practices defined in system plan along with past incidences and the potential for such treatments during annual inspections of operations which import organic products.

All marketing claims, including organic, must reflect reality and fulfill truth-in-advertising rules. Many of these claims also require additional certification to government or association standards before they can be used. Examples of other claims that may or may not be appropriate to include on your organic product label include: Kosher, Halal, Fair Trade, biodynamic, free-range, grass-fed, humane, wildlife-friendly, and pesticide-free. Be sure that any and all terms are appropriately used.

Transaction Certificate

The Transaction Certificate or TC is a certificate issued by a Certification Body to its Operator for every transaction of sale of organic products under NPOP. TCs are issued by a Certification Body upon verification of documents submitted by an Operator to ensure transparency in operations and traceability of organic product in the supply chain.

Provisional Transaction Certificate

Provisional Transaction Certificate or PTC is a transaction certificate issued prior to exports in the prescribed format which bears all the details pertaining to the shipment of a particular organic consignment except the transportation details. After the shipment, the transport details are entered for issuance of transaction certificate for export.

Policy & Procedures on Lot Creation and Conversion of Samples

I. Operator shall Update actual yield farmer wise in the Tracenet. Operator may Request ZENITH for updating the closing stock. Adequate timeline will be followed as per APEDA notification/ Advisories Then Generate lot or Batch and apply for transaction certificate.

- **For Grower Group:** Consignment shall be Created from multiple producer lots.
- **For Individual Producer:** Production lots created from registered farms
- **Processing &Trade (For both Food & Feed)**
- **Lot/ Stock Creation For processing and Trader:** create lot or stock or batch and inform the CB for Batch Approval.

II. ZENITH shall follow APEDA Guidelines in pursuant to standard requirement and take mandatory samples for all high risk products notified by APEDA for residue testing (including Ethylene Oxide and other prohibited Agrochemical) , genetic testing and other analysis. Testing to be carried out in ISO 17025 accredited and preferably APEDA approved laboratories having approved analytical method required for the analysis. Sampling method shall be followed as approved by the Competent Authority.

III. Based on review of analysis result ZENITH shall take decision for approval of lot for sale (All Export consignments). In the event of positive detection in analysis report, ZENITH will take appropriate disciplinary action followed by NONC. The concerned lot will be disapproved for organic transaction. The sample associated for the lot consignment shall be treated as conventional. The organic sample/lot/batch shall be converted to conventional. The ZENITH

action (Disciplinary action along with analysis report (original and Resampling as the case may be)shall be notified to APEDA within 15 days of its Action)

IV. ZENITH will take next representative sample to ensure the event of positive detection is not repeated and approve further lot for organic transaction. In case of repeated detection, entire product will be disapproved, may apply appropriate disciplinary action as deemed fit. For farm product (Conversion period may be applied to full or increase the conversion period, sanction land from certification). In case of Group; Whole Group may be sanctioned or part affected may be sanctioned (as deemed fit based on the severity), apply full conversion period, extend conversion period.

V. Where an infringement that affects the organic integrity is found, ZENITH 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.

VI. In case of any violation by the operator, ZENITH shall withdraw certification from the operator for a specified period (as per Decision) and inform about its decision to APEDA and shall also publish the same on their website.

14.ZENITH Labelling Requirements

Parameter	Labeling Requirement
"Organic" **(100% Organic Ingredients Use)**	▪ "Organic" should be written on the package. ▪ Use of only organic processing aids. ▪ The percentage calculations of organic ingredients must not include added salt or water. ▪ Operator must be certified, and the label has to include the name & accreditation number of the ZENITH. ▪ It is mandatory to use the Indian Organic seal.
"Certified Organic" or "Organic" **(At least 95% Organic Ingredients Use)**	▪ "Certified Organic" or "Organic" should be written on the package. ▪ It's allowed to use the term "organic" along with a percentage statement (like "98% organic ingredients") about the ingredients. ▪ The ingredients list should indicate which ingredients are organic & shall be listed on the product label in order of their weight percentage. Every additive(s) must be listed with its complete name. ▪ The percentage calculations of organic ingredients must not include added salt or water. ▪ Operator must be certified, and the label has to include the name & accreditation number of the ZENITH. ▪ It is mandatory to use the Indian Organic seal.
"Made with Organic…" **(70-95% Organic Ingredients Use)**	▪ "Made with organic (specified ingredients)" should be written on the package. ▪ Must contain at least 70% organic ingredients. ▪ A maximum of 30% of the product may consist of nonorganic ingredients or a limited list of non-organic additives/processing aid that are permitted as per NPOP regulation and approved by the ZENITH. ▪ The ingredients list should indicate which ingredients are organic & shall be listed on the product label in order of their weight percentage. Every additive(s) must be listed with its complete name. ▪ The percentage calculations of organic ingredients must not include added salt or water. ▪ It is prohibited to use the term "Organic" with the product name.

	▪ Operator must be certified, and the label has to include the name & accreditation number of the ZENITH. ▪ It is prohibited to use the Indian Organic seal.
<70% Organic Ingredients Use	▪ Only allowed to indicate organic ingredient(s) in the product's ingredient list. ▪ The percentage calculations of organic ingredients must not include added salt or water. ▪ It is prohibited to use Indian Organic seal. ▪ Certification is not necessary for these products.
Indian Organic Logo / Seal	▪ The India Organic Logo under National Programme for Organic Production (NPOP) is given below:  **The Indian Organic Logo must comprise of the colour specifications listed bel**  **C - 52 M - 8** **Y - 100 K - 0**  **C - 0 M - 78** **Y - 77 K - 0**  **C - 44 M - 11** **Y - 0 K - 0** ▪ As an exception, the India Organic Logo under NPOP may also be used in black and white as indicated below, only at the primary production level and in situations where applying it in color is not feasible:

	 - Prior written consent from ZENITH will be required for the use of the India Organic Logo in black and white, along with a clear explanation of the request. - The use of the India Organic Black and White Logo is restricted to primary production levels and products and scopes for which written consent has been obtained. - Form 1 must be submitted to ZENITH for a license to use the Indian Organic Seal. - Subject to the terms and conditions outlined in NPOP regulations, ZENITH will review the application and issue a license in Form 2 allowing the use of the Indian Organic Seal for the product or class of products manufactured by the operator in relation to the process used in any production, manufacture, or work. The license grant will be communicated to the operator by ZENITH. - A license shall be granted for a period of one year and a declaration by operator shall be given on Form 3. - ZENITH may change any terms and conditions under which the license has been granted at any time while it is still in effect by providing the operator with one month's notice. **For detailed information related to Indian Organic Seal/Logo, refer Section-7 of NPOP regulation.**
Certifier Identification	- It is necessary to state the ZENITH name & accreditation number. It needs to be positioned with the words "Certified organic by Zenith" just below the address of the certified processor or handler.

Other mandatory information	▪ The ingredient may be labeled as "herbs" or "spices" without specifying the percentage if herbs and/or spices make up less than 2% of the product's weight. ▪ Labels for aquaculture products must mention the use of iodized salt. ▪ To prevent potentially misleading claims, organic products should not be labeled as GE (genetic engineering) or GM (genetic modification) free, unless an importing country has a regulatory requirement that requires it, since GMO or its derivatives are prohibited under NPOP regulation. ▪ It is prohibited to use the Indian Organic seal for In-conversion products. ▪ **Product labels and produce boxes or containers must include the following:** a) The name and address of the certified operation. b) The name of the product and its organic status. c) If organic product is in In-conversion, Year of conversion should be mention. d) Identify Zenith as the certifier. e) Traceability information, such as Lot Number / Batch Number. f) Net wt. & Gross wt. g) Process Date / Packaging Date / Harvest Date. h) Expiry Date / Best Before Date. i) Product of Origin. j) Applicable organic standard. ▪ In case of non-edible product, statement related to “Not fit for human consumption” or related statement must include.

NOTE:

- If the ZENITH issues a suspension or cancellation, the certified operation must immediately cease the sale, labeling, and representation of products as organic.

Label Review and approval procedure:

— Use current version of templates- OSP, Forms
— Check scope and programme applicability to which label request to be approved.
— Review correct category of products to be approved (ingredients, certification status)
— Follow above table to review and approve labels under applicable scope and category.
— The label must contain the certifiers name or logo (“Certified organic by: ZENITH”-applicable after accreditation).
— Any retail label must be submitted to the certification agency for approval, before being used
— All import -Export trade arrangement requirements and labeling requirements must be followed and reviewed.
— Every label, tag, stickers use or intend to use must be approved prior to its use.
— Keep all approved labels in client file , add approved, disapproved tag status at top right page. Notify client of all approvals via mail . Include label verification checkpoint for physical inspection to verify appropriate and correct use in complaince to the regulatory requirement and certification requirement.
— ZENITH will share logo and directions to use with every approvals. The guidelines will be shared through application packet for operators ready reference. Logo will be shared through website link (this will be done after accreditation)

15. ZENITH Input Evaluation Policy

Operators are required to include all relevant details about inputs in their organic management plan (OMP), before the first inspection takes place. Operators are obliged to inform ZENITH beforehand, before using a new product. Using Inputs without having submitted them previously to the certifier for approval, is a non-compliance (even in case the product as such turns out to be compliant). Input evaluation will be conducted by Certification Specialist.

	Information disclosure	Operations who intend to use input materials as a part of their Organic System Plan/ Organic Management Plan must have each input evaluated. **Inputs must be requested prior to their use by submitting the Input Request Form.** Additional information such as labels, Flow chart, production/ manufacturing method, MSDS, and manufacturer information should be submitted to aid in the review. **In Case of multi-ingredient input:** All ingredients details from Manufacturer will be required. **Manufacturer (authorized person) must authenticate via Mail or any other authenticated documentation (Confirmation of Ingredients detail in Letter, MSDS Etc) .** ZENITH may also require additional information, such as BIG 3 Statements (non-GMO, not from radiation or sewage sludge) and organic ingredient certificates, where applicable. Operators are obliged to inform ZENITH beforehand, before using a new product. Using products, without having submitted them previously to the certifier for approval, is a non-compliance (even in case the product as such turns out to be compliant If the manufacturer does not want to disclose information about inert ingredients to the organic operator, then ZENITH can request this information directly from the manufacturer, signing a confidentiality agreement, if requested. If a confirmation of compliance ("certificate") with NPOP requirements has been issued by another accredited certification body , then ZENITH does not need detailed information . It must be assured, however, that the confirmation refers exactly to the products in discussion (some producers offer a wide range of similar products with similar commercial names!), and that the recipe has not been modified in the meanwhile

		Corrective and Preventive Action: • If a producer fails to mention a product in the OMP or annual OMP update, but the product, turns out to be compliant, this will be considered as a minor non-compliance. Repetition of the same minor non-compliance, however, will make it a severe non-compliance. In such cases, the crop may be de-certified. • If a producer uses a product for which full disclosure of information cannot be obtained, he will be asked to confirm in writing that the product will no longer be used. In this case, neither the crop will be de-certified, nor the land will lose its organic status. Repetition of the same non-compliance, however, will lead to de- certification of the crop, and the land will have to undergo a new conversion period. • If a farm has used (intentionally or non-intentionally) a crop protection product with non-allowed inert ingredients, then the crop will be de-certified and the land, on which the product has been applied, has to undergo a new three years conversion period.
	Basic Overview of Review/Approval Process	**Material Review/ input Approval Process:** Materials. Substances to be used as an input in organic production and handling. Materials include, but are not limited to: 1. fertilizers, soil amendments, potting soil, crop production aids, and pest control materials used in crop production; 2. feed supplements, feed additives, medications, and livestock production aids used in livestock production; and 3. ingredients, processing aids, post-harvest handling substances, sanitizers, and facility pest control materials used in processing and handling. **Review process:** • Verify that the material complies with the regulations by evaluating the product, all of the ingredients within the product, and, if applicable, the manufacturing processes, source materials, and processing aids used to produce the ingredients or final product (e.g., contacting the supplier/ formulator/ manufacturer to obtain full disclosure of the ingredients in the product and manufacturing processes, including processing aids). • ZENITH shall periodically confirm that input product formulations and processes have not changed. This shall generally be annually, but where a longer interval can be justified, must be at least once every 5 years. **In all cases, a ZENITH will:** • Maintain documentation to support its determinations about the status of a product's compliance with the

		regulations • Demonstrate appropriate education, training, and experience levels for personnel conducting material reviews
	Refer Annexure as indicated in NPOP Regulation. Condition for input use are defined , this includes **"Permitted" "Restricted" "Prohibited"** ***"Restricted" means that the conditions and the procedure for use shall be subjected to condition. Factors such as contamination, risk of nutritional imbalances and depletion of natural resources shall be taken in to consideration.***	**Refer Annex 3(1) : Products for Use in Fertilising and Soil Conditioning** **Refer Annex 3(2) : Products for Plant Pest and Disease Control** **Refer Annex 3(5): Permitted List of Feed Materials, Feed Additives & Processing Aids for Animal Nutrition** **Refer Annex 3(17): Food Additives Including Carriers for Use in Production of Processed Organic Food** **Refer Annex 3(18): Processing Aids and Other Products for Use in processing of ingredients of Agricultural Origin from Organic Production** **Refer Annex 3(19): Approved Products for Packaging of Organic Foodstuffs**
	Procedure to Evaluate Additional Inputs to Organic Agriculture	**Following checklist should be used for amending the permitted substance list for fertilizing the soil conditioning purposes** i. The material must be essential for achieving or maintaining soil fertility, or for meeting specific nutrient requirements related to soil conditioning and crop rotation. These needs must not be fulfillable by the practices described in Chapter 3 (NSOP) or by using other products listed in Annex 3(1). The ingredients must be of plant, animal, microbial, or mineral origin and may be processed through: a. Physical methods (e.g., mechanical, thermal) b. Enzymatic processes c. Microbial processes (e.g., composting, digestion) ii. The use of the material must not result in, or contribute to, unacceptable environmental effects or contamination, including harm to soil organisms. iii. The use of the material must not have an unacceptable impact on the quality or safety of the final product. **Following checklist should be used for amending the permitted substance list for the purpose of plant disease or pest and weed control** i. The material must be essential for controlling a harmful organism or specific disease, where no effective biological, physical, plant breeding alternatives, or management techniques are available. ii. The active substance must be of plant, animal, microbial, or mineral origin and may be processed using the following

		methods: a. Physical processes b. Enzymatic processes c. Microbial processes iii. The use of the material must not result in, or contribute to, unacceptable environmental impacts or contamination. iv. Nature-identical substances, such as chemically synthesized pheromones, may be considered when the naturally occurring equivalent is not available in sufficient quantities—provided that their use does not directly or indirectly contribute to contamination of the environment or the final product. **Evaluation** a. When an input is to be evaluated it must first be investigated by Zenith to see whether it fulfils the following six criteria. An input must fulfil all 6 requirements before it can be accepted as suitable for use in organic agriculture. b. Inputs should be evaluated regularly and weighed against alternatives. This process of regular evaluation should result inorganic production becoming ever more friendly to humans, animals, environment and the ecosystem. **Necessity** i. The necessity of each input must be clearly justified, based on the specific context in which it will be used. ii. Justification for the input may be based on factors such as: • Yield improvement • Product quality • Environmental safety • Ecological protection • Landscape preservation • Human and animal welfare iii. The use of an input may be subject to restrictions, including: a. Specific crop types (particularly perennial crops) b. Specific geographic regions c. Specific conditions under which the input may be applied **2. Nature and Way of Production** **a. Nature** i. The origin of the input should generally follow the order of preference below: a. Organic origin – including plant-based (vegetative), animal, or microbial sources b. Mineral origin ii. Non-natural, chemically synthesized substances that are identical to natural products may be permitted. iii. Where options exist, preference should be given in the following order: 1. Renewable inputs 2. Inputs of mineral origin

		3. Chemically synthesized inputs that are identical to natural products In assessing the allowance of chemically identical inputs, ecological, technical, and economic considerations may also be taken into account. **b. Way of Production** The ingredients of inputs may undergo the following processing methods: i. Mechanical processes ii. Physical processes iii. Enzymatic processes iv. Microbial processes (action of micro-organisms) v. Chemical processes – permitted only as an exception and under strict restrictions **c. Collection** The collection of raw materials used in the input must not compromise the stability of the natural habitat or threaten the conservation and maintenance of any species within the collection area. **3. Environment** **i. Environmental Safety** The input must not cause harm or have any long-term negative effects on the environment. It must not lead to unacceptable levels of pollution in surface water, groundwater, air, or soil. Environmental impact must be assessed at all stages, including processing, application, and degradation. **ii. Degradability** All inputs must be degradable to their mineral form. • Inputs with high acute toxicity to non-target organisms should have a maximum half-life of five days. • Natural substances that are not considered toxic are not required to degrade within a specific timeframe. **iii. Acute Toxicity to Non-Target Organisms** Inputs with relatively high acute toxicity to non-target organisms must be subject to restrictions. • Measures must be implemented to ensure the survival of these organisms. • Maximum application rates may be established. • If adequate protective measures cannot be taken, the input must not be permitted for use. **iv. Long-Term Chronic Toxicity** Inputs must not be used if they: • Accumulate in organisms or ecological systems, • Are known or suspected to have mutagenic or carcinogenic

		properties. If such risks are identified, sufficient mitigation measures must be implemented to reduce risks to an acceptable level and to prevent persistent environmental harm. **v. Chemically Synthesized Products and Heavy Metals** 1. Inputs must not contain harmful levels of synthetic chemicals (xenobiotics). Chemically synthesized substances may be allowed only if they are identical to their natural counterparts. 2. Mineral-based inputs should contain the lowest possible levels of heavy metals. o An exception is made for copper and its salts, due to a lack of alternatives and their long-standing traditional use in organic farming. o The use of copper must be treated as a temporary measure and should be strictly limited to minimize environmental impact. **4. Human Health and Product Quality** **a. Human Health** Inputs must not pose a risk to human health. The potential impact at all stages—processing, application, and degradation—must be thoroughly evaluated. • Measures must be taken to minimize any potential health risks. • Appropriate standards must be established and applied to all inputs used in organic production. **b. Product Quality** Inputs must not adversely affect the quality of the final product, including: • Taste • Shelf life (keeping quality) • Visual appearance **5. Ethical Aspects – Animal Welfare** Inputs must not negatively impact the natural behavior or physical well-being of animals kept on the farm. Their use must align with principles of animal welfare. **6. Socio-Economic Aspects** **Consumers' Perception** Inputs should be compatible with consumer expectations and values regarding organic products. • Even in the absence of scientific evidence of harm, inputs that are widely perceived as unsafe to human health or the environment should be reconsidered. • Inputs should not conflict with general perceptions of what is "natural" or "organic"—for example, the use of genetically engineered substances may not be acceptable, regardless of

		technical justification.
	Additional checkpoints for Commercial Input Approval	The procedure for granting approval to a product or input shall include the following elements: a. **Annual On-Site Verification :** Zenith shall visit the production/manufacturing units at least once annually to verify all necessary documentation related to the composition and formulation of the product manufactured by the producer. b. **Validity of Approval** : The period for which the approval is granted shall be clearly defined and mentioned in the approval certificate. Upon expiry, re-approval will be subject to a review of compliance and any changes since the last approval. c. **Obligation to Report Changes** : The manufacturer shall be mandated to report any changes in: • Product composition, • Manufacturing process, • Source or origin of ingredients, or • Any other relevant factor that may affect compliance with applicable standards. Failure to report such changes may result in suspension or revocation of approval. d. **Statement of Approval and Guarantee** : The approval shall include a clear statement outlining: • The scope and limitations of the approval, • The specific nature of the product approved, and • Any guarantees or claims associated with its use, in accordance with regulatory requirements and standards.

*After evaluation of Materials as per requirement, Reviewer must fill Input Evaluation Form for review results.

Template Ltr- Input Approval : This template will be used while notifying client for Input approval or rejection

Template Ltr- Input Review Status: This template will be used for acknowledging Input Request Form and indication to client regarding manufacturer information with status (reg. ZENITH asked manufacturer regarding ingredient disclosure or response not received from manufacturer yet)

Template Ltr-Input Manufacturer info: This template will be used for corresponding manufacturer to disclose ingredient.

Note that : Client can submit request at any time (i.e. During audit, in mid of the year) , ZENITH will accept the request and evaluate input per standard requirement and approval status will be intimated to client accordingly

16. Policy and Procedure: Operator Feedback Prior to Changes in Certification Activities

1. Policy Statement

Zenith recognizes the importance of transparency, stakeholder involvement, and continuous improvement in its certification processes. Therefore, before implementing any changes in the form or date of certification activities. Zenith ensure that feedback is obtained from relevant operators. This policy ensures that changes are practical, clearly communicated, and do not disrupt the integrity or accessibility of certification services.

2. Purpose

To establish a systematic approach for:

- Notifying operators of intended changes,
- Soliciting and considering their feedback, and
- Implementing changes in a fair and timely manner.

3. Scope

This procedure applies to all changes related to:

- The format, structure, or process of certification activities,
- The scheduling or timing (dates) of certification,
- Any modification that may affect certified clients or applicants.

4. Procedure

4.1. Identification of Change

- Changes may originate from regulatory updates, standard revisions, internal reviews, or stakeholder input.
- The proposed change shall be documented, along with proposed date of implementation.

4.2. Notification to Operators

- Operators (certified clients and applicants) shall be notified of the proposed change at least 7 days before the intended implementation.
- Notifications shall be made via email

4.3. Soliciting Feedback

- Operators shall be invited to submit feedback within a defined consultation period i.e 7 days
- Feedback methods may include direct emails, or virtual consultation meetings (if required).

4.4. Review and Analysis

Zenith management shall evaluate the feedback for:

- Valid concerns or objections,
- Suggestions for improving the change,
- Overall stakeholder sentiment

4.5. Finalization and Communication

- Based on the feedback, Zenith may revise the implementation plan or timeline.
- Final decisions shall be communicated to all operators, including:
    - Summary of received feedback,
    - Justification for the final decision,
    - Confirmed implementation date.

4.6. Recordkeeping

- All feedback, responses, meeting minutes, and final implementation documentation shall be retained for a minimum of 5 years.

5. Responsibilities

- **Certification Manager/Head:** Ensures compliance with this procedure.
- **Quality Assurance/Manager:** Coordinates feedback collection and documentation.
- **Top Management:** Approves final decisions based on feedback received.

6. Review and Revision

This policy and procedure shall be reviewed annually or whenever significant changes occur in certification operations.