



कृषि और प्रसंस्कृत खाद्य उत्पाद  
निर्यात विकास प्राधिकरण  
(वाणिज्य एवं उद्योग मंत्रालय, भारत सरकार)

**Agricultural and Processed Food Products  
Export Development Authority**  
(Ministry of Commerce & Industry, Govt. of India)

APEDA-ORG/76/2025  
18<sup>th</sup> July, 2025

**Sub: - Advisory on mandatory procedure for additional checks for Certification of  
Organic Cotton Production**

Dear Certification Bodies,

Please find attached mandatory procedure for additional checks for certification of organic cotton production for new/ operators in renewal for necessary compliance.

This issues with the approval of the NAB.

*Saswati Bose*  
18.07.2025  
Dr. Saswati Bose  
General Manager

**Procedure for Additional Checks for Certification of Organic Cotton  
Production for new/ operators in renewal**

**1. Objective**

To establish a stringent protocol for conducting additional checks for certification of organic cotton production to prevent fraudulent practices and to ensure strict compliance with NPOP regulations.

**2. Scope:**

This procedure applies to organic cotton production under NPOP.

**3. Additional measures and verification checks for new/ operators in renewal**

- i. Certification of organic cotton production shall be allowed by certification bodies in their respective designated zones as annexed.
- ii. Before certifying an area for organic production, the certification body shall verify the production of cotton in that area from the concerned district agriculture office(s).
- iii. On confirmation of the same, the certification body shall then conduct an unannounced pre inspection check to verify whether farmers are actually involved in cotton cultivation before registering a cotton project (new/through NoC). Further, the certification body shall check whether BT cotton cultivation is prevalent in that area or not in order to perceive risk.
- iv. During onsite visit, the seeds source shall be verified. The producers are required to provide the seed packets, declare the seed procurement source (to be verified/crosschecked by CB). The CB is also required to collect the seed samples for testing and retain counter sample. In case seed samples are not available, the testing of the standing crop shall necessarily be conducted during the cropping season and growers be intimated accordingly.

- v. For subsequent seasons, the CB has to mandatorily conduct one unannounced inspection of the standing crop for all cotton producers (grower group/individual producers) and collect samples of standing crop for testing. Third party analysis and residue testing to be carried out. **It is clarified that samples collected by the operators themselves and such test reports shall not be taken into consideration.**

It may be noted that in addition to the above, other testing requirements will be as per the perceived risk and requirements under NPOP 8<sup>th</sup> Edition.

- vi. Mass balance check to be carried out by CB during harvesting season with due diligence.
- vii. In case of detection of severe non compliances, appropriate sanctions shall be imposed by the CB.
- viii. **Submission of consolidated monthly reports:** The certification body shall submit monthly report on certification status of organic cotton operators, inspections, major non compliances, sanctions etc. to the NPOP Secretariat.

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