



Statement by the Global Organic Textile Standard on the Mandatory certification for organic textile products announced in India

Stuttgart, 12th December, 2014

The Director General of Foreign Trade (DGFT), Ministry of Commerce, Government of India, has issued a legally binding Public Notice ([as released on 18th November 2014](#) and [amended on 1st December 2014](#)) outlining that any product exported as an "organic product" will be required to be certified to the National Program for Organic Production ([NPOP](#)) by the 18th December, 2014 implementation deadline. While NPOP certification was already required for agricultural (food and raw fiber) products in the past, it will now also cover finished organic textile products. In this context, the Indian Standard for Organic Textiles ([ISOT](#)) was released as an integral part of NPOP; accordingly all organic textile products exported from India will require certification to ISOT. As per procedures established by India's Agricultural and Processed Food Products Export Development Authority (APEDA), a provisional Transaction Certificate (TC) is required before export (for customs) and a final TC is issued after exports. The buyer receives only the final TC.

GOTS has been communicating with Indian government since 2010 about this issue. However, since our and other stakeholder's interventions to the Indian government to abstain from introducing a mandatory national standard in order to avoid trade barriers and related implications for the organic textile sector have not been successful, we need to accept the decision and acknowledge in this context the Indian government's approach to consequently ask for certification of any "organic product" claims and to register the volumes of any organic (fibre) products exported through its traceability system "Tracenet."

This additional requirement as per a revised Indian legislation must not be confused with any kind of replacement or take-over of GOTS in India. Post implementation, the organic textile manufacturers will have to obtain ISOT certification as a legal requirement while GOTS certification will be required (as usual) as a buyers' requirement in order to allow corresponding organic labelling in the sales markets. GOTS is also formally recognized by United States Department of Agriculture, USA. GOTS standard, audit and certification procedures as well procedures related to issuance of GOTS TCs remain unchanged.

We trust that it will be in everyone's interest to keep the additional burden for the Indian organic textile industry as low as possible and will cooperate with the government and all parties involved for this goal. In this context we have encouraged the GOTS certifiers operating in India to seek accreditation for ISOT in order to be able to offer combined certification - GOTS and ISOT - to the Indian organic textile industry in the future. Three GOTS certifiers, Control Union Inspections and Certifications India Pvt Ltd., ECOCERT and OneCert have been audited for ISOT accreditation so far and are waiting for their accreditation letters.

APEDA, Ministry of Commerce, has assured that cooperation will be extended to facilitate exports of organic textiles already produced before notification of the new rules. Our Indian Representative, other stakeholders and export business people are in discussion with the Indian government regarding ensuring a smooth implementation of the new rule without hampering the interests of exporters and the subsequent supply chain companies. The currently applicable deadline is 18th December 2014 and requests are being made to extend it further so that the certifiers will be accredited and prepared to issue ISOT scope and transaction certificates to the exporters before the (new) deadline.

We therefore call on the responsible Indian authorities especially to reconsider their implementation deadline set for NPOP/ISOT certification for organic textile exports in order to allow the Indian export industry to adapt to the new legal requirements in a realistic timeframe (of an additional twelve months) so that current exports are not hampered and Indian exporters can continue their organic textile business without interruption.

Secondly, as ISOT is restricted to cotton and silk only, we request the authorities to modify the notification to allow export of GOTS certified organic materials made with other organic fibres such as wool, linen, coir etc., which are not covered under ISOT, for which the "NPOP/Tracenet TC" cannot be generated.