

Frequently Asked Questions (FAQ) Regarding Intertek's Suspended Activities

Background

The following information is intended to help clarify questions regarding the updated scope of suspension of Intertek Testing Services NA, Inc. (Intertek) for Textile Exchange standards. As this is an evolving situation, Textile Exchange remains committed to providing ongoing guidance as new relevant information becomes available.

Frequently Asked Questions

Latest updates & current scope of suspension

Can you clarify the sequence of events leading up to Intertek's suspension in India and for the OCS, and include the latest updates?

Effective July 31, 2024, Intertek Testing Services NA, Inc. (Intertek) elected to voluntarily suspend all of its activities related to the Organic Content Standard (OCS) at its office in India, including the issuance of OCS scope certificates (SCs) and transaction certificates (TCs) from this office.

On August 13, 2024, Intertek's accreditation body, ANSI National Accreditation Board, LLC (ANAB), took the decision to accept its voluntary suspension, subject to further assessment by ANAB on related areas.

Following said assessment, ANAB revised the terms of Intertek's suspension to the Textile Exchange standards on October 8th, 2024. As a result, the restrictions on Intertek's office in India now include all Textile Exchange standards, and Intertek offices globally may no longer accept new OCS clients. This means that no Intertek offices may issue OCS SCs for new clients as of this date.

What does this mean for certified sites in India (all standards)?

Intertek's office in India is restricted from conducting any certification activity for all Textile Exchange standards in scope (OCS, GRS, RCS, CCS). Intertek offices outside of India that have been approved by ANAB, may maintain SCs and issue TCs for existing clients of Intertek India. This is limited to activities which do not expand the scope of certification, such as SC renewals.

Please be advised that approved Intertek offices outside of India may experience a high volume of demand from Indian sites and delays may occur.

What does this mean for certified sites outside of India (all standards)?

The updated suspension covers Intertek's operations globally for the OCS, which means Intertek may no longer accept new OCS clients nor make scope additions or extensions for existing OCS clients as of October 8th, 2024. Other Textile Exchange standards in geographic regions outside of India are unaffected.

Effects of suspension/restrictions on transaction certificates

How do the suspended activities affect currently pending and future transaction certificates for certified organizations in India?

There may be delays for OCS, GRS, and RCS TCs which have been submitted to Intertek offices in India that are currently pending, as these will be re-directed to other Intertek offices which have been approved by ANAB to issue TCs. This applies to both the issuance of pending and forward moving TCs. There may be disruptions for certified organizations who require a product be added or a change to their SC in order for a TC to be issued, as Intertek offices globally are not permitted to expand the scope of certification for OCS sites.

GOTS certified sites that are certified by Intertek and are within scope of the global GOTS suspension (including gins and spinners) will not be able to obtain TCs. This means that those who rely on GOTS input TCs for OCS output material may see disrupted supply chains and breaks in the chain of custody if their inputs are coming from a site that is impacted by the suspension. [Please check GOTS public information on the status of CB suspensions in their system.](#) suspensions in their system.

Considering the above scope of suspension, there may be delays for certified organizations in India during this period. To understand which options are available to you, please read more below.

How do the suspended activities affect currently pending and future transaction certificates for certified organizations outside of India?

Certified organizations who are clients of Intertek outside of India may be issued TCs for all Textile Exchange standards as normal. However, there may be disruptions for certified organizations who require a product be added or change to their SC for a TC to be issued, as Intertek offices globally are not permitted to expand the scope of certification for OCS sites. It is also important to note that organizations who use input TCs from India may experience significant delays and breaks in the chain of custody due to the suspension.

Similarly, GOTS certified sites that are certified by Intertek and are within scope of the global GOTS suspension (including gins and spinners) will also not be able to obtain TCs. This means that those who rely on GOTS input TCs for OCS output material may see disrupted supply chains and breaks in the chain of custody if their inputs are coming from a site that is impacted by the suspension.

How do the suspended activities affect previously approved OCS transaction certificates?

TCs previously issued by Intertek are still considered valid – unless otherwise notified by Intertek or Textile Exchange.

May material received without a transaction certificate still be processed at a certified site?

Yes, material received without a TC may still be processed at a certified site, but no outgoing TC can be issued until the incoming TC is received. Material received without a TC can also be shipped to the subsequent supplier/certified buyer even though TCs will be delayed.

At what point is a final product not eligible for claims and labeling?

Products are ineligible for claims and labeling in the following instances: a) the brand is not certified, or b) the brand is certified, but the final product TC from the direct supplier of that shipment is not available or has been invalidated.

It is important to note, organizations who use input TCs from India may experience delays or disruptions due to the aforementioned suspension affecting Indian sites. This may create cases where there are breaks in the chain of custody.

Options for certified organizations in India who are clients of Intertek

What are my options as a certified organization in India certified with Intertek?

We understand certified organizations are faced with difficult decisions right now, so the following information offers a brief overview of various considerations. To support this, the subsequent information has been prepared to support understanding the relevant Textile Exchange policies which pertain to migrating CBs in cases of suspension, namely, [Calibration 232 which is outlined in ASR-221 Calibration Log](#), and [ASR-104-V3.1 Policy for TCs](#) (section A8.5).

It is important to note that CBs are required **to communicate with their clients directly about how this suspension will impact their certification services**, according to the [Procedure for the Withdrawal of Certification Body Licensing](#) (ASR-112), section D.

With that in mind, if you are a certified client of Intertek, you should soon receive further information about how the suspension impacts on your organization.

Remain certified with Intertek for the duration of the suspension

It is possible for certified organizations in India to remain certified with Intertek for the duration of the suspension. Intertek offices outside of India may service Indian organizations to issue TCs and maintain their current scope of certification, including SC renewals.

Please note, that Intertek offices which are approved by ANAB to conduct certification activities for existing clients in India may experience a high volume of requests, potentially causing longer waiting times. TCs may be issued up to 180 days from the earliest shipment date for product listings included in a valid SC at the time of shipment, as per A8.3 in ASR-104-V3.1.

If your organization has pending TCs and the products were not listed on an SC at the time of the production or shipment, those will need to be approved and added to the SC by Intertek once the suspension is lifted in order to qualify for a TC.

Transfer CBs during or after the suspension period

If you decide transferring certification bodies (CBs) is the best option for your organization, Textile Exchange has created guidance to facilitate the process and to clarify the responsibilities between CBs (from the “preceding CB” to the “succeeding CB”). For a full list of certification bodies and the countries/regions in which they operate, please see our website [here](#).

Explanation of criteria in ASR-104-V3.1, Section A8.5

Further guidance was added to section A8.5 of [ASR-104-V3.1](#), which permits a new CB to issue TCs for products shipped during the validity of an organization’s previous SC. According to the criteria, the succeeding CB shall take responsibility for issuing TCs once the new SC is issued to the seller. The succeeding CB must ensure the products were eligible to be included on a TC for the applicable date. The succeeding CB shall also conduct volume reconciliation to verify that the claimed material has not been oversold by the organization, which may include receiving volume reconciliation data from the preceding CB

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Explanation of Calibration 232

Calibration 232 addresses the process for conducting transfer audits in situations where a CB has been suspended. This calibration is designed to ensure that organizations can maintain their certification continuity and mitigate risks when their CB is unable to fulfill its duties due to suspension.

Transfer audits, which are abbreviated in nature, allow for a streamlined transition to a new CB without the need to wait for the standard recertification cycle. Under this calibration, a transfer audit may be initiated if the original certification body remains suspended for the organization's scope at least seven calendar days before the transfer audit is conducted.

Organizations are encouraged to work closely with their new certification body to understand the specific requirements and to ensure a smooth and effective transition. For further details on the procedures and criteria for transfer audits, stakeholders should refer to [ASR-112-V2.0, C3.5](#), which outlines the relevant guidelines in more detail.

If I transfer to a new CB, will I need a new audit before my new SC is active, and therefore before TCs are issued, including previously requested TCs?

If you decide transferring CBs is the best step for your organization, a new audit will need to occur to maintain an active SC. When an organization transfers between CBs (from the “preceding CB” to the “succeeding CB,”), the succeeding CB may issue TCs for shipments from the time when the organization was certified with the preceding CB, provided that all the conditions of [ASR-104-V3.1 Policy for TCs](#), section A8.5 are met.

Textile Exchange published [Calibration 232](#) to create a streamlined process for conducting transfer audits, which are abbreviated in nature, in cases of CB suspension. For more information on this calibration, please refer to the above question.

There will be a cost associated with a new audit that will be set by the new certification body. Please contact your preferred certification body for more information on pricing as this could differ between companies. Contact information for all licensed CBs is available on our website at textileexchange.org/certification-bodies.

How long should I expect the transfer to take place?

Each situation is unique. The succeeding CB will provide more information as to the transfer time based on the relevant factors and their availability.

One of the measures that Textile Exchange has implemented to minimize market disruption while maintaining system integrity is calibration 232, which allows outlines the process for expedited transfer audits.

Textile Exchange’s role and measures taken to minimize disruption

What has Textile Exchange done to address the market disruptions due to CB suspensions?

Textile Exchange has been in consistent communication with ANAB and Intertek to align on a path forward which minimizes supply chain disruption while protecting the chain of custody and claims made by the Textile Exchange standards. Below is an overview of the relief measures we have implemented in our policies to reduce impacts on supply chains in cases of CB suspension.

To best equip affected stakeholders with relevant and up to date information, we are creating dedicated documents like this to clarify applicable guidance and frequently asked questions. However, we emphasize the

importance for certified organizations to discuss the situation directly with Intertek in case there are relevant updates at any given time that will support decision-making.

Textile Exchange has implemented several measures and updated our policies to minimize market disruption while maintaining system integrity. These changes included [calibration 232](#), which allows for expedited transfer audits, as well as updates in section A8.7 in [ASR-104-V3.1 Policy for TCs](#) which provide flexibility on timelines for TC issuance when a CB has not been permitted to issue TCs during the suspension period by their accreditation body. Additionally, section A8.5 of ASR-104-V3.1 stipulates that in cases of CB transfer, the succeeding CB may issue TCs for the period before the transfer. We are in regular communication with all CBs in our system to address any emerging issues or disruptions that require policy attention.

How does Textile Exchange's assurance system for its standards work?

As a **standard-setting body**, Textile Exchange creates standards for the segregation, identification, and volume reconciliation of certified material at each stage of the supply chain. However, it does not perform any certification services directly – this is done by third-party certification bodies (CBs).

These **certification bodies** verify our requirements through annual audits, as well as volume monitoring throughout the year. Each time goods like yarns or fabrics are sold, the certification body issues TCs based on volume. This chain of custody requires everyone along the supply chain to do their part to support the integrity of the certified material.

Accreditation bodies monitor and assess the certification bodies to ensure that they are operating as intended and in conformity with the requirements of our standards system.

If inconsistencies arise, we work directly with the certification bodies and accreditation bodies to resolve them.

If the issue lies with the certification client, it's up to our certification bodies to issue, suspend, or withdraw SCs, and/or to issue, amend, or invalidate TCs. The list of Textile Exchange banned entities is available [here](#).

In the instance that the certification body has significant lapses in its conformity with the system requirements, it is up to the accreditation body to determine if a suspension or withdrawal of their accreditation status is warranted. However, as the standard-setting body, Textile Exchange also reserves the right to terminate our licensing contract with the certification body in cases of serious breaches.

You can find out more about how certification works for organic cotton [here](#).

How are issues and allegations raised dealt with in Textile Exchange's standards system?

Textile Exchange is committed to maintaining the integrity of our standards, and we take allegations and complaints very seriously. Any time that we receive an official complaint following the guidelines of our *ASR-110 Complaints and Feedback Policy* ([available publicly on our website](#)), we investigate the issue raised.

As per *ASR-110-V2.0*, criteria B2.1, Textile Exchange encourages that complaints against certified organizations be first submitted to the organization's certification body directly, and that complaints against certification bodies be first submitted to the applicable certification body directly, or, to the certification body's accreditation body.

A list of all licensed certification bodies and authorized accreditation bodies as well as their contact information can be found on our website at the following links:

- textileexchange.org/certification-bodies
- textileexchange.org/accreditation

Textile Exchange cannot share the status or outcome of a complaint investigation with the submitter as the details of all complaints and investigations are confidential. However, Textile Exchange may contact the submitter should we require further information to support our investigation, if permitted by the authorization provided.

What are the next steps when an issue is raised, and who deals with it?

Complaints are dealt with by the relevant party that is responsible for enforcing the requirements of the system. This means that complaints against certified organizations are handled by the certification body, and complaints against certification bodies are handled by the accreditation body.

The responsible party will investigate the allegations. In some cases, Textile Exchange may also conduct an investigation directly. If the result of an investigation is that the findings substantiate the complaint, then corrective actions are taken to address any non-conformities.

In some cases, the certification body or accreditation body may decide to apply sanctions such as suspension or withdrawing certification or accreditation. Depending on the nature and severity of the issues, Textile Exchange may also take direct actions, such as terminating our licensing contract with a certification body.

Timeline of suspension and future updates

How can I learn updates on Intertek's progress towards the India office resuming operations?

Textile Exchange is committed to providing timely and clear communications on any updates on the scope and duration of the suspension. We will post updates on our website and share communications via our email list and on the Hub. If you have any additional thoughts or concerns, please contact standards@textileexchange.org.

To learn more about the activities permitted to be performed by Intertek's India offices, you can reach out directly to Intertek at traceability@intertek.com

When will the suspensions be lifted?

The suspension placed on Intertek may be lifted once corrective actions have been implemented and these measures have been verified by Intertek's accreditation body, ANAB. The decision to lift the suspension must go through a formal decision-making process following ANAB's procedures. Textile Exchange understands the

disruptive ramifications of the suspension, and we are committed to pursuing a course of action which protects the integrity of the chain of custody while minimizing adverse effects on certified organizations.

We are in continued communication with both Intertek and ANAB on this critical matter and will prioritize sharing new information as the situation evolves. We will post updates on our website and share communications via our email list and on the Hub. If you have any additional thoughts or concerns, please contact standards@textileexchange.org.

Will this happen again in the Textile Exchange system?

In the current situation, the CB (Intertek) has taken the decision to suspend certification activities related to the OCS managed by its India office, and subsequently the AB (ANAB) has reviewed and decided the scope of the suspension. Each accreditation body sets its own options and requirements around suspensions and withdrawals, including CBs declaring voluntary suspensions. It is possible that CBs in the future will take similar decisions.

To maintain impartiality, we cannot influence decisions taken by accreditation bodies, including suspensions of CB accreditation, and the severity of the suspension scope. Our objectives are that mitigation is in place to avoid CB suspensions, but they are an important and necessary tool to ensure the whole system functions as it should. Our primary focus is on the integrity of the certification system; while this is our focal point, we will do what we can to clearly communicate guidance and options to keep things moving and provide information that helps certified organizations make decisions.

Where do I find a list of approved CBs for India in case I want to consider transferring?

You can find a full list of CBs on our website at textileexchange.org/certification-bodies. (Use control/command F to search for “global” or “India” in the “geographic scope” column on this page).