

## Managing Certification Disruptions in the Supply Chain/CU India Suspension Webinar

### Q&A

**\*Important note: as of 17 May 2023, [the suspension of CU India has been lifted](#).** As of this date, CU India may resume all certification activities related to Textile Exchange standards, such as (but not limited to) issuing transaction certificates including for certified products shipped while the suspension was in place.

Following are questions received in writing during the public webinar and Textile Exchange responses. We are still sharing these in case some aspects of the Q&A are still relevant to certified organizations in their processes today.

- 1. As the calibration 229 indicates, there are possibilities that we may not be able to issue Transaction Certificates (TCs) until we change to a new Certification Body, particularly when the input is cotton or lint. How do we serve our customers for this period during transition?**

If and when CU India's suspension is lifted, they will be allowed to issue TCs following the standard criteria. If you choose to change Certification Bodies, the new Certification Body would be allowed to issue TCs if the criteria of Calibration 229 are met, but this does include the limitation on seed and lint cotton inputs.

- 2. In a case where the Scope Certificate (SC) has expired or is about to expire (previously issued by Control Union) and the new Certification Body (CB) is overburdened with increased audits, new scope certificates may take 10-14 weeks. Regarding this timeframe, how do we go about shipments?**

You need to have a valid SC when shipments are made for the product to be eligible for a Transaction Certificate (TC). CU India is allowed to recertify their current clients during the suspension. If you choose to change CBs and they cannot issue your new SC before the expiry of your SC with CU India, you will have a gap in certification where no TCs are possible.

- 3. We have dispatched lint at the beginning of 2023 under CU India scope, now we have moved to a new Certification Body. How will we get Transaction Certificates (TC) of those dispatched?**

If and when CU India's suspension is lifted, they will be allowed to issue these TCs provided all our standard criteria are met.

- 4. When will the updated Calibration 229 be available? We learned TE now accepts Transaction Certificates (TCs) issued before October 1st 2022.**

This was posted to our document center and shared with CBs last week. See

<https://textileexchange.org/knowledge-center/documents/calibration-log/>

The October 1, 2022 date was removed, but please note that there are still requirements that relevant TCs be available in Textile Exchange's portal on our website for this calibration to be applied.

- 5. We have certification for other materials from Control Union (CB). Should we go for an annual renewal to CU or search for another Certification Body?**

Textile Exchange is not able to advise if you should change certification bodies or not, for either our own standards or any other. CU India clients for our standards are not required to change certification bodies at this time to remain certified.

**6. Can we transfer pending TCs to the new CB after getting those TCs withdrawn from CU portal?**

Yes, you may reapply for TCs with your new CB. Your new CB will be able to issue them if the criteria of Calibration 229 and our standard timelines are met.

**7. What is the direction on products that are in transit and waiting to receive a Garment Transaction Certificate (TC) - but certificates are on draft with CU or input material certificate sites with CU India and cannot be issued now?**

Calibration 229 would allow sites to move to another Certification Body (CB) in this instance for that TC to be issued by the new CB. However, it is possible for the CU India suspension to be lifted so it is up to each organization to make that decision for themselves.

Textile Exchange recommends that the supplier receives their input TC prior to applying labels to control for the risks of TC issues.

**8. The GOTS input Transaction Certificate (TC) has not been allowed to provide Organic Content Standard (OCS) certification. We have to provide farm certificates, etc, now to change over GOTS input TC to OCS output TC. With CU India suspension, this is further complicated as most of the Indian ginners and spinners are with GOTS. Can we have waiver on this for more time?**

Textile Exchange requires that additional documentation be provided now when GOTS inputs are to be used for OCS certified products. We recognize that this adds complexity to TC applications. TCs with GOTS inputs will be able to be issued by CU India if and when the suspension is lifted, or by a new CB following a transfer if the criteria of Calibration 229 are met.

**9. In case we are opting to transfer to a new Certification Body (CB), I request you to please provide us sufficient timeline and the same should be informed to brands for providing the timeline for manufacturers so that we can cooperate and go ahead with the new CB.**

CU India clients are not required to change CBs at this time. If and when CU India's suspension is lifted, they will be allowed to issue these TCs provided all our standard criteria are met.

If you choose to change CBs, you will need to work with the new CB's timelines. However, we are now allowing a simplified transfer audit to be done in these cases, which may speed up the process.

**10. Where can I find a list of Certification Bodies in India?**

You may search for CBs in India and any other country through the listing on our website: <https://textileexchange.org/certification-bodies/>

**11. Is it mandatory to have a withdrawal letter from the previous Certification Body (CB) to proceed with a new audit with a new CB?**

Textile Exchange does not require a withdrawal letter for CB transfers, though individual CBs may have their own procedures. The new CB is required to review volume reconciliation data from the previous CB.

**12. Regarding Transaction Certificates (TCs) that have been applied for prior to the suspension period and are in CU India's TC pipeline, there are supply chain partners who are certified by CU India but are now moving to other certification bodies. This transfer could take several weeks due to the limited capacity of other certification bodies. This would mean the time of TCs being issued will take longer and may exceed 180 days. Will Textile Exchange make an exception and allow TC issuance period to exceed 180 days due to this suspension?**

If and when CU India's suspension is lifted, they will be allowed to issue these TCs following our standard criteria. The nature of this question is what happens when the normal procedure for the 180-day timeline has passed in the case of transferring to a new CB. Textile Exchange has provided a limited exemption to CBs as follows:

**EXEMPTION LANGUAGE**

**Exemption 334 - Control Union India TC applications over 180 days**

Some transaction certificate applications were submitted to Control Union India within 180 days of the first shipment date but were left unprocessed upon the suspension of this certification body. When some organizations tried to apply Calibration 229 after transferring to another certification body, they found out that the application had gone over 180 days and Calibration 229 doesn't address ASR-104-v3.0 A8.3 to allow the issuance of those transaction certificates.

Textile Exchange is granting all certification bodies a limited exemption to A8.3 of ASR-104-v3.0 to issue transaction certificates when more than 180 days pass by between the earliest shipment date and the certification body receiving a complete and valid application, provided that all of the following conditions are met:

1. The exemption is limited to sellers who were certified by Control Union India on March 3, 2023.
2. The seller has subsequently transferred from Control Union India to another certification body.
3. The complete and valid transaction certificate application is received by the certification body no later than June 1, 2023.
4. The criteria of Calibration 229 and all other applicable transaction certificate issuance criteria are met.

**13. If we change Certification Bodies (CBs) and get our scope certificate, then does our raw material supplier also have to get certified with a new CB?**

CU India clients are not required to change certification bodies at this time. Any certified organization may buy from a supplier who is certified with any certification body for the same scope. Suppliers certified by CU India will not have TCs until the suspension is lifted.

**14. Is volume reconciliation data enough to transfer to a new Certification Body (CB) and be eligible for a new Scope Certificate?**

If you are looking to change certification bodies, please talk to the new certification body about what they will need to see.

**15. Which is the current status of ginners that buy seed cotton (from a field that does not issue TCs) and sell lint cotton? Could they issue a lint cotton Transaction Certificate (TC) because there is not input seed cotton TC?**



Gins are not eligible for TCs from a new Certification Body under Calibration 229 since their inputs are seed cotton. If and when their suspension is lifted, CU India will be able to issue these TCs for their clients provided all our standard criteria are met.

**16. We have been audited by the new Certification Body (CB) but the certification issue is pending. Can we do shipment or wait until the certificates are issued?**

You need to have a valid Scope Certificate (SC) on the shipment date (whether from the old or new CB) in order for the products to be eligible for a Transaction Certificate (TC). Shipment can proceed without a TC as long as there is a valid SC.