



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)

Ref: APEDA/ORG/18

Date: 29.05.2023

Sub: Observations of the EU Mission onsite visit 2022

Certification Bodies,

The EU Mission has visited APEDA for their onsite audit during November 2022 to assess the compliance of the equivalency of the Indian Organic Crop Production Standards (NPOP) and conformity assessment procedure with their standards. The observations of the EU Mission onsite audit were communicated to all CBs vide letter date 02.03.2023 for compliance. The EU observation was reiterated in the meeting held on 26.05.2023.

In view of the findings of the EU Mission, all the Certification Bodies (CBs) under NPOP are required to meet the following compliance:

1. Ensure that up-to-date lists of certified operators are publicly available, as referred to in the NPOP, Chapter 4, point 4.2.10. This list should also indicate withdrawn operators as referred to in the NPOP.
2. Ensure that CBs comply with the NPOP, in particular Chapter 4, points 4.3.1.2 and 4.3.1.3 and have appropriate procedure and criteria in place for carrying out risk assessment of their operators and each year meet the minimum requirement for additional and unannounced risk-based inspections.
3. Ensure that CBs comply with the requirements of the NPOP, in particular Chapter 4, point 4.2.4 regarding the competence of staff and that the internal audits referred to in point 4.2.9 include proper evaluation of inspection staff, including at least periodically, witness/shadow audit of their works.
4. Ensure that the CB inspection referred to in the NPOP, Chapter 4, point 4.2.1.1 and Chapter 5, point 5.13 are of an appropriate quality and thoroughness, in particular that they include proactive selection of original documents for verification of the effectiveness of the ICS, complete mass balance checks, systematic verification of borders of organic fields for protection against cross contamination from neighboring fields, proactive inspection (with eyes lifted off the check list) of fields, premises and equipment for any signs of use of unauthorized products, appropriate and thorough investigations when signs of use of unauthorized products have been seen, verification of maps provided by the ICS and taking of action when they are inadequate.

(Handwritten signature)

5. Ensure that when operators change CB, the entire operator file, referred to in the NPOP, Chapter 4, point 4.4. 10 is transferred, including a full inspection history, than just the most recent inspection results, as well as any complaint history (e.g. involvement in OFIS cases)
6. Ensure that CBs, in line with the NPOP, Chapter 4, point 4.3.1.4: a) take a reasonable proportion of their risk-based samples in the field during the growing season where the chance of detecting non- authorized use of pesticides is the highest and where follow-up of any positive laboratory results can be the most effective, have appropriate procedures and instructions for taking crop samples in the field under various circumstances and for properly recording those circumstances for use when interpreting any subsequent positive laboratory results, for all sample taking, implement measures to avoid contamination of samples, include a reasonable range of unauthorized substances in the laboratory analyses and that they ensure that the laboratories are accredited for that entire range.
7. Ensure that CBs promptly follow up all findings of unauthorized products with a view to find the cause of the contamination and apply appropriate corrective measures. No action threshold for positive laboratory results should be applied.
8. Ensure that CBs have an appropriate catalogue of sanctions as required by the NPOP, Chapter 4, point 4.4.4. Sanctions should be dissuasive and should be applied to entire PGs when inspections, based on the representative sample of farmers, show that the ICS has failed.

All the Certification Bodies are required to submit action taken report. The compliance will be verified by the Evaluation Committee (EC) during future evaluations, witness audits and unannounced inspections.

Yours faithfully

Saswati Bose
29.05.2023
Dr. Saswati Bose
(General Manager)