



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)

ORG-2015-16-000102
Dated July 12, 2023

Sub: Advisory on the additional requirements required for export of organic products to EU

Certification Bodies,

As you are aware, the present equivalency agreement with EU for organic products (category A & F) will continue for a limited period of time (till 31st December 2026) subject to compliance to the EU requirements.

The observations of the EU Mission during onsite audit held in November 2022 were communicated to all the CBs vide advisories dated 02.03.2023 and 29.05.2023. The observations of the EU onsite audit were discussed in details during the Consultative Meeting held on 26.05.2023 in New Delhi.

The European Commission has recently communicated additional requirements in addition to the compliance of the observations of the EU onsite audit of November 2022.

All the certification Bodies are required to meet the following compliance with immediate effect for certifying organic products for export to the European Union under the NPOP EU equivalency

1. All certification bodies are required to follow a harmonized and higher range of non-authorized substances (at least 250) for testing of samples of consignments for export to the EU.
2. All certification bodies under NPOP to **take at least one representative sample of each consignment of the unprocessed products** listed below. These additional samplings of the following products should be carried out until the end of 2023. The results of the samplings should be uploaded on TraceNet and accompany, where relevant, the Certificate of Inspection (CoI) in TRACES.

- turmeric / curcuma
- sesame seeds
- ginger
- amaranth seeds
- psyllium husk powder
- quinoa seeds
- flax seeds
- moringa
- soya beans
- Unprocessed tea leaves
- Unprocessed guar gum



3. For sampling and testing of products for export to EU, all the certification bodies under NPOP are required to follow the sampling and testing requirements of EU (sampling methods described in EU regulation 691/2013 and Commission Directive 2002/63/EC, copy enclosed for your reference).

The analysis of samples for pesticide residues should be by validated methods (including single residue methods where relevant) in accredited laboratories for more than 250 parameters (as mentioned in point no. 1).

The scope of analysis should cover all the relevant pesticides including ETO

It was also an observation of the EU onsite audit that a reasonable range of unauthorized substances should be covered in the laboratory analyses.

All the Certification bodies under NPOP are required to ensure strict compliance to the requirements and provide action taken report along with evidence of action taken within 30 days from the date of issue of the advisory.

Ensuring compliance to the requirements of standards and certification procedure by the Certification Bodies is a continuous process. Any lapses on the part of the certification bodies compromises the credibility of the products exported.

This has resulted in serious concerns raised by the European Commission. Opening of negotiations with EU for bilateral trade in organic will depend on the effectiveness of India's control system. All Certification Bodies are required to demonstrate due diligence for upholding the present India EU recognition agreement paving way for forthcoming bilateral negotiations for continuity of organic exports to the European Union.

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