

## **CIRCULAR**

Bengaluru 09<sup>th</sup> August 2021

## ADITI/INDIA/2021/CIRCULAR/ETO TESTING FROM NABL ACCREDITED LABS

## Ref: Updating lab analysis requirements in light of the recent ETO detection frequency.

Dear Respected Operators,

Greetings from Aditi Organic Certifications Pvt. Ltd.

We are sure most of you know the control authorities of certified organic products in the European Union reported detection of Ethylene Oxide (ETO) in many of the products imported from India since early 2020. Investigation to find out the potential sources of such contaminant in the certified products is going on and no reliable or authentic investigation findings reported by any of the stakeholders in the industry. As one of the preventive measures, Aditi makes it mandatory that every transaction of certified risky products like sesame, psyllium and amaranthus to undergo sampling for Ethylene Oxide from an NABL accredited lab which have a valid MOU with Aditi to consider the lab test reports during processing of application for a PTC/TC. Aditi requires the following detail to be included in the lab report.

- 1. Operators full name and address must be indicated when the sampling is sent by the operator directly and Aditi's name must be indicated in the analysis report wherein a lab representative/operator collects the sample.
- 2. NABL logo or accreditation status must be printed in the first page of the analysis report.
- 3. Following details must be indicated in the first page of the lab analysis report:

Name of the sample
Sample seal number, & quantity
Date of receipt
Batch/lot number of the product
Total quantity of the product batch/lot
Sampling done by
Starting date of analysis

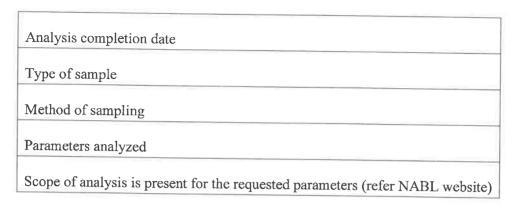
Registered Office No. 38, 1st & 3rd Floor, 20th Main Road, First Block, Rajajinagar, Bengaluru - 560 010 India

Phone : 0091-80-2332 8134 / 2332 8135 / 2332 8136

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Findle: .0091-80-2332 8134 / 2332 8135 / 2332 8136

Email: aditi@aditicert.net, aditiorganic@gmail.com





Kindly find enclosed the list of labs who have got the NABL accreditation with scope of analysis to test ETO. Kindly let us know if there are any other labs, who may get NABL accreditation with such scope of analysis in due course for us conclude MoU with them so that you may use their lab testing services.

As a preventive measures Aditi would like to Introduce-One Step forward and one step backward system.

One Step Forward: We will be collecting buyer contact email ID and the concerned international CB/Certifier's email ID before issuance of Certificate of Inspection (COI). Please find enclosed the TC application form with the changes made as annex 4. In case of consignments consisting of high-risk products and the consignment bound to EU countries, we will be sharing the issued TC copy (or COI details) along with the analysis report to keep them informed about the status of the consignment. We requested APEDA to inform the EU regulating body or control authority in EU countries that the responsibility of our operator/Indian CBs lies until the certified products reaches the buyer's destination as indicated in the COI. The major responsibility must lie with the buyer and the concerned CB/certifier in the importing country thereafter. Otherwise, we share the tracking and traceability of the products and other facts available with us.

One Step backward: We ask our operators to share the back/source TC with the analysis reports before or on arrival of the certified products to Aditi certified units. Sample will be drawn by an Aditi recognised representative and once the recognised/validated lab analysis shows no residue of ETO or suspected un-allowed substances, we do the closing stock/batch approval in the Tracenet System for further processing.

Hope we have informed you sufficiently and look forward to getting your full cooperation at this challenging time.

Thanking you,

Your faithfully,

For Aditi Organic Certifications Pvt. Ltd.

or ADITI ORGANIC CERTIFICATIONS P

Narayaha Upadhyaya M.

Managing Director Encl: Same as above



## List of Subcontractors

SI.	ADITI-Subcontractors: Name and Address	ADI
No	ADITI-Subcontractors: Name and Address	Subcontracting activity
1	Eurofins Analytical Services India Pvt. Ltd. #540/1, Doddanakundi Industrial Area2, Hoodi, Whitefield, Bangalore 560 048 Tel: 080-30982500 Fax: 41680405 FarhanaAyesha@eurofins.com; ShaliniTripathi@eurofins.com;	Laboratory Testing ETO analysis done.
2	Nawal Analytical Laboratories Plot No. 100 New SIDCO Industrial Estate Srinagar, Hosur 635126 Tel: 04344-291218, 09894785841 green_balu74@yahoo.com; ecogreen.labs@gmail.com;	Laboratory Testing ETO analysis done.
3	Eureka analytical services pvt ltd, 31st milestone, main gt road, near Amr mall, Kundli, Sonipat, Haryana, India 077958 33308 info@eurekaserv.com	Laboratory Testing ETO analysis done.
4	SIMA labs A-3/7, Mayapuri Industrial Area, Phase II, Mayapuri, New Delhi, Delhi 110064 labmarketing@simalab.com	Laboratory Testing ETO analysis done
5	ITC Limited labs Itc Infotech Park Harischandra layout, Jeevanhalli, Cox Town, Bengaluru, Karnataka 560005 080 2298 1100 contactus@itc.in	Laboratory Testing ETO analysis done

For ADITIONGANIC CERTIFICATIONS TO A LOCAL Managing Director