

Bangalore  
August 30, 2023



**ADITI**  
Organic Certifications Pvt. Ltd.

## **CIRCULAR**

**Subject: Revised Protocol for Sampling and Testing of Products as per APEDA Advisory, dated July 12, 2023**

**Ref. No.: ADITI/HO/2023/CIRCULAR/007**

Dear Esteemed Clients,

We extend our warm greetings from Aditi Organic Certifications Pvt. Ltd.

In line with the Advisory issued by the Agricultural and Processed Food Products Export Development Authority (APEDA) on July 12, 2023, which we shared via email on July 25, 2023, we are now outlining the updated procedure for the sampling and testing of products intended for export or domestic trade. This communication provides a clear roadmap for compliance with APEDA's stipulations.

The protocols detailed here are contingent upon factors such as the nature of the consignment (export or domestic), the destination country, the source of raw materials, and the certifying body involved. We have categorized the specific conditions for each scenario in the sections below.

## **EXPORT OPERATIONS**

### **High-Risk Products as Identified by APEDA**

APEDA designates the following eleven products and their processed variants as high-risk for export to EU countries:

Turmeric  
Sesame  
Ginger  
Amaranth seeds  
Psyllium husk powder  
Quinoa seeds  
Flaxseed  
Moringa  
Soybean  
Unprocessed tea leaves  
Unprocessed guar gum

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### **Aditi's Additional High-Risk Product for EU Exports**

In conjunction with the aforementioned eleven products, Aditi identifies Corn starch/Maize as an additional high-risk product for export to EU countries.

### **Sampling and Testing Protocol**

For all export transactions to EU countries, the twelve high-risk products (eleven listed by APEDA plus Corn starch/Maize) will be subject to sampling by Aditi. These products will undergo comprehensive testing encompassing over 250 parameters.

When exporting to countries other than the EU, the eleven high-risk products defined by APEDA along with Corn starch/Maize will require sampling and testing by Aditi. However, the limitation of 250+ parameters will not be applicable for these destinations.

### **Special Notes for Non-High-Risk Products**

For non-high-risk products, regardless of the destination (EU or other countries), testing is mandatory, and the resultant test reports must be shared with Aditi during the Provisional Transaction Certificate (PTC) application process. While operators can conduct the sampling and testing of these non-high-risk products, it is imperative that such testing is exclusively performed in a laboratory accredited by the National Accreditation Board for Testing and Calibration Laboratories (NABL).

### **Tracenet Requirement**

The updated list of high-risk products has been integrated into Tracenet for lot approval. Consequently, test reports need to be uploaded onto Tracenet for batch/lot approval. It is essential to ensure that the sampling date falls on or after the batch creation date.

## **DOMESTIC TRANSACTIONS**

### **Aditi's High-Risk Product List for Domestic Transactions**

Aditi categorizes the previously mentioned eleven products as high-risk for domestic transactions and extends this classification to encompass two more products:

Corn starch/maize

Cotton

Sampling and Testing Guidelines

For all domestic transactions involving these thirteen high-risk products, Aditi will conduct both sampling and testing. The specifics for various conditions are elaborated below.

### Specific Conditions for High-Risk Products

In cases of domestic transactions with non-Aditi certified buyers, it becomes the responsibility of the operator to ensure that Aditi performs the necessary sampling and testing for the specified high-risk products.

If an Aditi-certified operator receives unprocessed raw materials (pertaining to any or all of the listed high-risk products) at their processing unit, a sample of these raw materials must be dispatched to Aditi. Subsequently, once the raw materials are transformed into the final product, Aditi will coordinate the sampling and testing for all export consignments (as detailed earlier). For domestic utilization where the buyer lacks Aditi certification, the sampling and testing coordination must again be facilitated by Aditi.

In instances of domestic transactions involving high-risk products where both the seller and buyer are registered under Aditi, the product sample should be sent to Aditi before or during the Trade Certification (TC) application process.

We emphasize that these processes strictly align with APEDA's advisory and are to be meticulously followed. Effective September 01, 2023, we earnestly request our esteemed operators to adhere to the procedures delineated in this communication for both export and domestic consignments. Your continued cooperation and adherence are greatly appreciated.

Warm regards,

For ADITI ORGANIC CERTIFICATIONS PVT. LTD.

Narayana Upadhyaya  
Managing Director

