



ADITI

Organic Certifications Pvt. Ltd.

Bangalore
October 29, 2024

CIRCULAR

Subject: Additional Testing Requirements for Organic Exports to EU Countries

Ref. No.: ADITI/HO/2024/Circular/017

Dear Valued Clients,

Warm greetings from Aditi Organic Certifications Pvt. Ltd.

We would like to bring to your attention an important update from the Agricultural and Processed Food Products Export Development Authority (APEDA), based on their Advisory dated July 12, 2023, and subsequent updates on September 02, 2024. These updates require enhanced testing protocols for organic consignments exported to the European Union (EU).

Key Points of Compliance

High-Risk Products for EU Exports:

- The following products must undergo testing for 250+ agrochemical molecules, including Ethylene Oxide (ETO), by Aditi:
- Sesame seeds
- Ginger
- Amaranth seed
- Psyllium husk powder
- Quinoa seeds
- Flax seeds
- Unprocessed tea leaves

Non-High-Risk Products for EU Exports:

- Testing for non-high-risk products must be conducted in NABL-accredited laboratories, coordinated by the operator.
- Test reports are required at the Provisional Transaction Certification (PTC) stage, along with a sample to be provided to Aditi.

Exports to Non-EU Countries:

- Similar testing is required for non-EU destinations, coordinated by Aditi for high-risk products.

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- For other products, NABL-accredited test reports must be provided by the operator, in line with the specific country's requirements.

Domestic Transactions of High-Risk Products:

- **For buyers certified by Aditi:** No testing required; however, retain two samples at the operator's facility.
- **For non-Aditi certified buyers:** Testing in NABL-accredited labs is mandatory, coordinated by Aditi.

Special Requirement for Curcuma/Turmeric Exports to EU:

- A third-party test report from an EU-accredited CB or Aditi is required at the PTC stage for turmeric or processed turmeric products.

Please adhere strictly to these guidelines to ensure compliance and a smooth export process.

Thank you for your cooperation and commitment to maintaining organic integrity.

For Aditi Organic Certifications Pvt. Ltd.

For ADITI ORGANIC CERTIFICATIONS PVT. LTD.

Managing Director

Narayana Upadhyaya

Managing Director

List of agrochemicals for testing of organic food and feed for export to the European Union

Sr. No.	Chemicals
1.	1-Naphthylacetamide and 1-naphthylacetic acid
2.	2,4-D
3.	4-Bromo-2-chlorophenol (a metabolite of Profenophos)
4.	4-Chloro-3-methylphenol
5.	6-Benzyl adenine
6.	Abamectin
7.	Acephate
8.	Acetamiprid
9.	Afidopyropen
10.	Alachlor
11.	Aldicarb
12.	Aldrin and Dieldrin (Aldrin and dieldrin combined expressed as dieldrin)
13.	Allethrin and Bioallethrin
14.	Ametoctradin
15.	Ametryn
16.	Amisulbrom
17.	Anilofos
18.	Atrazine
19.	Azadirachtin
20.	Azimsulfuron
21.	Azoxystrobin
22.	Benalaxyl including other mixtures of constituent isomers including Benalaxyl-M (sum of isomers)
23.	Bendiocarb
24.	Benomyl (see carbendazim)
25.	Bensulfuron-methyl
26.	Bifenazate (sum of bifenazate plus bifenazate-diazene expressed as bifenazate)
27.	Bifenthrin (sum of isomers)
28.	Bispyribac (sum of bispyribac, its salts and its esters, expressed as bispyribac)
29.	Bitertanol (sum of isomers)
30.	Boscalid
31.	Bupirimate

Sr. No.	Chemicals
32.	Buprofezin
33.	Butachlor
34.	Captafol
35.	Captan (Sum of captan and tetrahydrophthalimide, expressed as captan)
36.	Carbaryl
37.	Carbendazim and benomyl (sum of benomyl and carbendazim expressed as carbendazim)
38.	Carbofuran (sum of carbofuran (including any carbofuran generated from carbosulfan, benfuracarb or furathiocarb) and 3-hydroxy carbofuran expressed as carbofuran)
39.	Carboxin (carboxin plus its metabolites carboxin sulfoxide and oxycarboxin (carboxin sulfone), expressed as carboxin)
40.	Carfentrazone-ethyl (sum of carfentrazone-ethyl and carfentrazone, expressed as carfentrazone-ethyl)
41.	Carpropamid
42.	Cartap hydrochloride
43.	Chlorantraniliprole
44.	Chlordane (sum of cis- and trans-chlordane)
45.	Chlorfenapyr
46.	Chlorfenvinphos
47.	Chlorfluazuron
48.	Chlorimuron-ethyl
49.	Chlormequat (CCC)
50.	Chlorothalonil
51.	Chlorpropham
52.	Chlorpyrifos
53.	Chlorpyrifos-methyl
54.	Chromafenozide
55.	Cinmethylen
56.	Clethodim (sum of Sethoxydim and Clethodim including degradation products calculated as Sethoxydim)
57.	Clofentezine
58.	Clomazone
59.	Clothianidin
60.	Coumachlor
61.	Coumatetralyl
62.	Cyantraniliprole
63.	Cyazofamid
64.	Cyenopyrofen
65.	Cyflufenamid (sum of cyflufenamid (Z-isomer) and its E-isomer,

Sr. No.	Chemicals
	expressed as cyflufenamid)
66.	Cyflumetofen
67.	Cyfluthrin (including other mixtures of constituent isomers sum of isomers)
68.	Cyhalofop-butyl
69.	Cymoxanil
70.	Cypermethrin (cypermethrin including other mixtures of constituent isomers (sum of isomers))
71.	Cyproconazole
72.	Cyprodinil
73.	DDT (all isomers, sum of p,p'-DDT, o,p'-DDT, p,p'-DDE and p,p'-TDE (DDD) expressed as DDT)
74.	Deltamethrin (cis-deltamethrin)
75.	Diafenthiuron
76.	Diazinon
77.	Dichlorvos
78.	Diclofop (sum diclofop-methyl and diclofop acid expressed as diclofop-methyl)
79.	Diclosulam
80.	Dicofol (sum of p,p' and o,p' isomers)
81.	Dieldrin (see Aldrin)
82.	Difenoconazole
83.	Diflubenzuron
84.	Dimethoate
85.	Dimethomorph (sum of isomers)
86.	Dinocap (sum of dinocap isomers and their corresponding phenols expressed as dinocap) (Where only meptyldinocap or its corresponding phenol are detected but none of the other components constituting dinocap (including their corresponding phenols), the MRLs and residue definition of meptyldinocap are to be applied)
87.	Dinotefuran
88.	Diquat
89.	Dithianon
90.	Dithiocarbamates (dithiocarbamates expressed as CS ₂ , including maneb, mancozeb, metiram, thiram and ziram)
91.	Diuron
92.	Dodine
93.	Edifenphos
94.	Emamectin benzoate B1a, expressed as emamectin
95.	Endosulphan (All isomers, sum of <i>alpha</i> - and <i>beta</i> -isomers and

Sr. No.	Chemicals
	endosulphan sulphate expressed as endosulphan)
96.	Endrin
97.	Epoiconazole
98.	Ethephon
99.	Ethion
100.	Ethiprole
101.	Ethofenprox (Etofenprox)
102.	Ethoxysulfuron
103.	Ethylene oxide (sum of ethylene oxide and 2-chloroethanol expressed as ethylene oxide)
104.	Etoxazole
105.	Etrimfos
106.	Famoxadone
107.	Fenamidone
108.	Fenarimol
109.	Fenazaquin
110.	Fenhexamid
111.	Fenitrothion
112.	Fenobucarb
113.	Fenoxaprop-p
114.	Fenpropathrin
115.	Fenpyroximate
116.	Fenthion (fenthion and its oxygen analogue, their sulfoxides and sulfone expressed as parent)
117.	Fenvalerate (any ratio of constituent isomers (RR, SS, RS & SR) including esfenvalerate)
118.	Fipronil (sum of fipronil + sulfone metabolite (MB46136) expressed as fipronil)
119.	Flonicamid (sum of flonicamid, TNFG and TNFA expressed as flonicamid)
120.	Fluazifop-P (sum of all the constituent isomers of fluazifop, its esters and its conjugates, expressed as fluazifop)
121.	Flubendiamide
122.	Flucetosulfuron
123.	Fluchloralin
124.	Fluensulfone
125.	Flufenacet (sum of all compounds containing the N-fluorophenyl-N-isopropyl moiety expressed as flufenacet equivalent)
126.	Flufenoxuron
127.	Flufenzin
128.	Flumioxazine

Sr. No.	Chemicals
129.	Fluopicolide
130.	Fluopyram
131.	Flupyradifurone
132.	Flusilazole
133.	Fluthiacet-methyl
134.	Fluxapyroxad
135.	Fomesafen
136.	Forchlorfenuron (CPPU)
137.	Fosetyl-Al (sum fosetyl + phosphorous acid and their salts, expressed as fosetyl)
138.	Halosulfuron methyl
139.	Haloxypop (Sum of haloxypop, its esters, salts and conjugates expressed as haloxypop (sum of 0.01the R- and S- isomers at any ratio))
140.	Heptachlor (sum of heptachlor and heptachlor epoxide expressed as heptachlor)
141.	Hexachlorocyclohexane (HCH), alpha-isomer
142.	Hexachlorocyclohexane (HCH), beta-isomer
143.	Hexaconazole
144.	Hexazinone
145.	Hexythiazox
146.	Imazamox
147.	Imazethapyr
148.	Imidacloprid
149.	Indaziflam
150.	Indoxacarb (sum of indoxacarb and its R enantiomer)
151.	Iodosulfuron-methyl (sum of iodiosulfuron-methyl and its salts, expressed as iodiosulfuron-methyl)
152.	Iprobenphos
153.	Iprodione
154.	Iprovalicarb
155.	Isoprothiolane
156.	Isoproturon
157.	Ivermectin
158.	Kresoxim methyl
159.	Lambda-cyhalothrin (includes gamma-cyhalothrin) (sum of R,S and S,R isomers)
160.	Lindane (Gamma-isomer of hexachlorocyclohexane (HCH))
161.	Linuron
162.	Lufenuron (any ratio of constituent isomers)
163.	Malathion (sum of malathion and malaoxon expressed as

Sr. No.	Chemicals
	malathion)
164.	Mandipropamid
165.	Matrine & Oxymatrine
166.	Mepiquat (sum of mepiquat and its salts, expressed as mepiquat chloride)
167.	Meptyldinocap
168.	Metaflumizone (sum of E- and Z- isomers)
169.	Metalaxyl and Metalaxyl-M (metalaxyl including other mixtures of constituent isomers including metalaxyl-M (sum of isomers))
170.	Metamifop
171.	Metamitron
172.	Methabenzthiazuron
173.	Methamidophos
174.	Methomyl
175.	Methoxyfenazide
176.	Metolachlor and S-Metolachlor (metolachlor including other mixtures of constituent isomers including S-metolachlor (sum of isomers))
177.	Metrafenone
178.	Metribuzin
179.	Monocrotophos
180.	Myclobutanil
181.	Nereistoxin
182.	Nitenpyram
183.	Novaluron
184.	Omethoate
185.	Orthosulfamuron
186.	Oxadiargyl
187.	Oxadiazon
188.	Oxathiapiprolin
189.	Oxycarboxin
190.	Oxydemeton- methyl (sum of oxydemeton methyl and demeton-S-methylsulfone expressed as oxydemeton-methyl)
191.	Oxyfluorfen
192.	Paclobutrazol
193.	Parathion - methyl (sum of Parathion-methyl and paraoxon- methyl expressed as Parathion -methyl)
194.	Parathion ethyl
195.	Penconazole
196.	Pencycuron
197.	Pendimethalin

Sr. No.	Chemicals
198.	Penoxsulam
199.	Permethrin (sum of isomers)
200.	Phenthoate
201.	Phorate (sum of phorate, its oxygen analogue and their sulfones expressed as phorate)
202.	Phosalone
203.	Phosphamidon
204.	Picoxystrobin
205.	Pinoxaden
206.	Pirimiphos-methyl
207.	Pretilachlor
208.	Profenophos
209.	Propamocarb
210.	Propanil
211.	Propargite
212.	Propetamphos
213.	Propiconazole (sum of isomers)
214.	Propoxur
215.	Pymetrozine
216.	Pyraclostrobin
217.	Pyrazosulfuron-ethyl
218.	Pyridaben
219.	Pyridalyl
220.	Pyriproxyfen
221.	Pyrithiobac-sodium
222.	Pyroxasulfone
223.	Quinalphos
224.	Quinoxifen
225.	Simazine
226.	Spinetoram (sum of spinetoram-J and spinetoram-L)
227.	Spinosad (sum of Spinosyn A+D)
228.	Spirodiclofen
229.	Spiromesifen
230.	Spirotetramat and spirotetramat-enol (sum of), expressed as spirotetramat
231.	Sulfentrazone
232.	Sulfosulfuron
233.	Sulfoxaflor (sum of isomers)
234.	<i>tau</i> -Fluvalinate
235.	Tebuconazole

Sr. No.	Chemicals
236.	Tembotrione (Sum of parent tembotrione and its metabolite (4,6-dihydroxy tembotrione), expressed as tembotrione)
237.	Temephos
238.	Tetraconazole
239.	Thiabendazole
240.	Thiacloprid
241.	Thiamethoxam
242.	Thifluzamide
243.	Thiobencarb (4-chlorobenzyl methylsulfone)
244.	Thiocyclam
245.	Thiodicarb
246.	Thiometon
247.	Thiophanate-methyl
248.	Tolfenpyrad
249.	Topramezone
250.	Transfluthrin
251.	Triadimefon
252.	Triadimenol
253.	Triafamone
254.	Tri-allate
255.	Triasulfuron
256.	Triazophos
257.	Trichlorfon
258.	Tricyclazole
259.	Tridemorph
260.	Trifloxystrobin
261.	Triflumezopyrim
262.	Triflumizole
263.	Trifluralin
264.	Validamycin
265.	Zoxamide
266.	Glyphosate
267.	Nicotine

Note: The laboratories having accreditation for more molecules as per ISO 17025 can undertake additional parameters as per requirement.