

Annex 2: Policy on Test Reports to be submitted along with the application for Transaction Certificate.

As per the CU Inspection Regulations, operators have to keep one test sample for each consignment for a period of 6 months as a reference sample. In the event of any claim or complaint from the buyer or in case CU wants to verify the product, the sample would be taken for analysis to prove the organic status of the product.

The NAB has implemented 'TraceNet' through APEDA and from the 15th of June 2010, it has become mandatory to issue the Scope Certificates and Transaction Certificates through 'TraceNet'. One of the aspects of TraceNet is that a Test Certificate proving the organic status of the product be attached along with the application for Transaction Certificate.

In this regard, Control Union has drafted this new Policy to adhere to the requirements of APEDA and NAB.

1. Own production

Where the operator has his own product which is produced and processed according to the requirements of the relevant standard and CU Inspection Regulations, the verification of the Chain of Custody and product handling process has to be clearly mentioned in the application form.

- a) During the inspection of CU of the concerned project, the consignment or/and processed products available in the unit/relevant samples from the previous shipment would be taken for analysis on a random basis based on the risk assessment of the inspector.
- b) The relevant sample should be kept sealed (by the Inspection Agency) with the operator for a period of 6 months. The information on the sample should correspond to the lot no., identification no., type of packaging, buyer, quantity and type of packaging.
- c) If the operator so desires, the operator may request CU to take a sample from the consignment for analysis (prior intimation is required to arrange for sampling by CU)
- d) The sample for analysis would be sent to laboratory** for analysis.
- e) In addition to the above, if the operator so desires, the operator may request CU to take a sample from the consignment for analysis for every shipment (prior intimation is required to arrange for sampling by CU)
- f) The cost of sampling and analysis would be borne by the operator.

2. Products processed in certified unit but the product is grown by operator/another seller certified by another accredited CB

Where the crop is grown by operator or another grower/seller certified by another accredited CB the following would be applicable.

- a) Samples should be taken for the consignment (processed product) by the Inspection Agency for analysis.

- b) One sample should be sent to laboratory** for analysis for general screening of pesticides and GMO (in case of cotton). One sample should be kept in safe custody of the operator for a period of not less than 6 months in sealed condition.
- c) The information on the sample should correspond to the lot no., identification no., type of packaging, buyer, quantity and type of packaging.
- d) In the event of CU inspection, the samples may be taken for analysis (discretion of the Inspector)
- g) In addition to the above, if the operator so desires, the operator may request CU to take a sample from the consignment for analysis (prior intimation is required to arrange for sampling by CU)
- h) The cost of sampling and analysis would be borne by the operator.

3. Traded product

Where the operator purchased processed product/final product and sells them according to the following methods.

- a) Direct trading (only labelling)
- b) Purchase of product, storage and then trading

In the above cases, the following are applicable.

- a) In this case, the operator has to intimate CU about shipment being traded at least one month in advance.
- b) 2 samples should be taken for the consignment (processed product) by the Inspection Agency who has been authorized by the buyer* (as mentioned in the L/C or Contract) to take samples for analysis.
- c) One sample should be sent to laboratory** for analysis for general screening of pesticides and GMO (in case of cotton). One sample should be kept in safe custody of the operator for a period of not less than 6 months in sealed condition.
- d) The information on the sample should correspond to the lot no., identification no., type of packaging, buyer, quantity and type of packaging.
- e) CU will also do the sampling randomly at least 10% (based on risk/high risk products, the sampling percentage may be increased)
- f) If the operator so desires, the operator may request CU or its nominated Inspection Agency to take a sample from the consignment for analysis (prior intimation is required to arrange for sampling by CU or its nominated Inspection Agency)
- g) The cost of sampling and analysis would be borne by the operator.

** Where no Inspection Agency is nominated by the buyer, the sampling may be done by any ISO 9001 certified Inspection Agency*

*** Sample analysis should be done at IS 17025/NAB approved laboratories and preferably APEDA approved laboratories.*