

Subject: Observations of EU Mission onsite visit

Certification Bodies,

This has reference to the EU mission onsite audit during November 2022 and Advisory issued on 10.01.2023.

All the certification bodies are advised to submit the action taken report. The requirements along with documentary evidence required is clarified below:

Sl. No	EU Mission recommendations	Corrective action required
1.	To ensure that up-to-date lists of certified operators are publicly available, as required in the NPOP, Chapter 4, point 4.2.10. This list should also indicate withdrawn operators as referred to in the NPOP, Chapter 4, point 4.4.5.	According to NPOP Chapter 4 Clause 4.2.10 (ii) and Clause 4.4.5, the CBs are required to publish updated list of operators and list of withdrawn operators on their official website. In this regard, an advisory was issued dated 10.01.2023 for updating the list of valid certified operators. Further the CBs are also advised to update the list of withdrawn operators. Hence, all the CBs are advised comply with the observation of EU and submit the corrective action immediately.
2.	To ensure that the CB inspections referred to in the NPOP, Chapter 4, point 4.3.1.1 and Chapter 5, point 5.13 are of an appropriate quality and thoroughness, in particular that they include: b) complete mass balance checks,	The Certification Bodies are advised to prepare procedure for mass balance check. The inspector of CB should be aware of procedure for verifying mass balance. The Certification Bodies should meet the compliance and may be informed to APEDA.
3.	To ensure that CBs comply with the requirements of the NPOP, in particular Chapter 4, point 4.2.4 regarding the competence of staff and that the internal audits referred to in point 4.2.9 include	As per NPOP, Chapter 4, point 4.2.4 and 4.2.9, the Certification Bodies are required to have a system in place for regularly evaluating the performance of inspectors. Therefore all the CBs are advised to make necessary provisions in their policies to add system for regular evaluation and also for conducting shadow

	proper evaluation of inspection staff, including, at least periodically, witness/shadow audits of their work.	audit of their internal inspectors. Action taken has to be informed by 12 th March.
4.	<p>To ensure that CBs, in line with the NPOP, Chapter 4, point 4.3.1.4:</p> <p>a) take a reasonable proportion of their risk-based samples in the field during the growing season where the chance of detecting non-authorized use of pesticides is the highest and where follow-up of any positive laboratory results can be the most effective,</p> <p>b) include a reasonable range of unauthorized substances in the laboratory analyses and that they ensure that the laboratories are accredited for that entire range.</p>	<p>a) It is advised to take samples from field at various stages of crops since the chances of detection of non-authorized use of pesticides are the highest. The Certification Body should develop procedure for collecting samples from field at various stages of crops and soil sampling for detection of unauthorized products.</p> <p>Hence, Certification Bodies should take necessary corrective actions and sent the same to APEDA. The CBs should also train their inspectors for proper collection of samples, testing and reporting.</p> <p>b) The CBs are advised to develop procedure to verify that the laboratories are accredited for testing all the methods or substances. It is also advised to develop a wider range of substances for analysis. Hence, the CBs should comply with the observations and submit the corrective action.</p>

All the CBs are requested to provide action taken report (hard copy) by 12th March 2023 along with all requisite documents for assessment of compliance by APEDA.



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