TRADE NOTICE: APEDA/QMC/GEN/2008
DATED: MARCH 24, 2008

RESIDUE MONITORING PLAN

FOR 2008

FOR DRUGS, PESTICIDES

AND HEAVY METALS

FOR EXPORT OF HONEY

TO THE EUROPEAN UNION

Agricultural and Processed Food Products
Export Development Authority
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RESIDUE MONITORING PLAN FOR 2008 FOR DRUGS, PESTICIDES AND HEAVY METALS FOR EXPORT OF HONEY TO THE EUROPEAN UNION

Background

Residue levels of drugs, pesticides and heavy metals in food commodities, is becoming a major concern for food regulators all over the world. Since the residue levels cannot be changed drastically through various production techniques and because it is necessary to provide safe food to the consumers, it is essential that adequate monitoring should be in place to eliminate the possibility of the presence of the residues in food commodities in excess of the prescribed levels.

The European Union, have desired that a residue-monitoring plan (RMP) for honey be in place right from the supplier's level. This will ensure monitoring and control at the processing level. The structure of this plan has been established to monitor residues of drugs, pesticides and heavy metals at the following stages:

a) Testing of raw honey at the time of receipt from suppliers at the processing units.

b) Testing of processed honey stored in the storage premises of processors, and meant for export to the European Union.

The Government of India, Department of Commerce (Ministry of Commerce and Industry), vide order dated 19th December, 2003 issued under the Export Inspection Council of India (EIC) Act and published in the Gazette of India has authorized APEDA to monitor the residues under a RMP implemented through a Trade Notice, notifying the procedure given in the following paragraphs:

1.	Objective	1.1	To establish a system for monitoring residues of drugs, pesticides and heavy metals in honey (i) at the time of receipt of raw honey (ii) at the honey processing unit and (iii) in processed / packaged honey.
		1.2	To establish a system for corrective action in the event of detection of residues levels higher than those established through this RMP.
		1.3	To establish a system for corrective action in the event of issuance of an Internal Alert Information.
		1.4	To ensure that honey exported from India to the European Union does not test for residues of drugs, pesticide and heavy metals in excess of the prescribed levels.

2.	Scope	2.1	All honey processing units intended to process honey for export, recognized laboratories and their pre-requisites will get covered under this residue-monitoring plan.
3.	Procedure for sampling and inspection	3.1	A list of Nominated Laboratories for the purposes of sampling and testing and National Referral Laboratory (NRL), APEDA, EIC and honey processors/exporters is given in **Annexure-1 and Annexure-1A** respectively.
		3.2	The procedure to be followed by the nominated laboratories & NRL for sampling and testing is as given in **Annexure-2.**
		3.3	Method of sampling for checking residues of drugs, pesticides and heavy metals are given in **Annexure-3.**
		3.4	All honey exporters intending to export honey to the EU shall notify to APEDA, complete address with contact details of all their honey processing/manufacturing facilities.
		3.5	All honey exporters will register their processing units with Export Inspection Council of India / respective Export Inspection Agencies (EIC/EIAs) as per procedure and also indicate this registration number in **Annexure-4** of this document.
		3.6	Authorized representative of the nominated laboratories shall visit the honey processing units of the exporter without any prior notice and draw samples on a random basis for testing as per the sampling plan.
		3.7	At the time of sampling, a sample slip as per **Annexure-5** will be filled-up by the processor and signed by the authorized representatives of the processor and the laboratory. A copy of Annexure-5 for each sample shall immediately be forwarded to NRL for sample collection information.
		3.8	Samples of raw and processed honey shall be tested for the limits of drugs, pesticides and heavy metals as given in **Annexure-6.**

		3.9	Samples from all batches of processed/ packed honey shall be drawn for testing.
		3.10	In case of non-cooperation from the honey processing units, nominated laboratories shall bring it to the notice of APEDA, which shall take appropriate action.
4.	Accreditation / Recognition requirements & responsibilities of Nominated Laboratories	4.1	All the nominated laboratories shall be accredited to the National Accreditation Board for Testing and Calibration Laboratories (NABL) as per ISO/IEC-17025.
		4.2	All the nominated laboratories shall have APEDA recognition under its scheme for laboratory recognition.
		4.3	The nominated laboratories shall test for residue levels of the drugs, pesticides and heavy metals (listed in **Annexure-6**) to be monitored for exports as per the method of analysis given in AOAC or any other validated method.
		4.4	The nominated laboratories shall issue a test report, within one week of the drawl of the samples, as per format given in **Annexure-7** to the honey-processing unit and a copy will be sent to APEDA, EIC and NRL**.**
		4.5	The nominated laboratories shall submit monthly statement (by the 5th day of the following month) of samples tested, to APEDA, NRL and EIC in **Annexure-8.** In case, the samples exceed the MRLs, the nominated laboratory will immediately bring it to the notice of NRL, EIC and APEDA. The NRL will decide on necessary modifications in the sampling plan for the following month.
		4.6	The designated laboratories shall participate in the training/proficiency/ inter-laboratory testing programmes organized by NRL.
		4.7	The nominated laboratories are under an obligation to provide access, on demand, to their analysis records (including chromatograms) to authorized officials of APEDA, EIC and National Referral Laboratory.

5.	Responsibilities of National Referral Laboratory (NRL)	5.1	The NRL will monitor the work of nominated laboratories by conducting surveillance audit on six-monthly basis to ascertain that they are following the criteria laid down under this residue monitoring plan.
		5.2	The NRL will audit minimum 5% documents of the samples for which tests have been carried out by the nominated laboratories. On the basis of the data, the NRL will also prepare a plan of action for the following year.
		5.3	The NRL shall draw 2% of the samples directly from the registered honey suppliers, from the raw honey storages of the processing units of the exporters pertaining to the batches tested by the designated laboratories for drugs, pesticides and heavy metals. The NRL shall analyze the samples and report their finding to APEDA and EIC as per the format given at Annexure-7.
		5.4	During the year, the NRL shall evaluate 5% of the tested samples analyzed by the nominated laboratories.
		5.5	NRL will submit to APEDA and EIC, a quarterly statement (**Annexure-9**) of consolidated test reports received from the nominated laboratories along with a complete analysis of the statistical data for corrective action and for preparation of the RMP for the following year.
		5.6	NRL will also prescribe the method of sampling/testing/analysis and validation.
		5.7	The NRL shall update itself on the amendments pertaining to the residue levels implemented by the importing countries, especially the EU with the help of the industry. It will verify this information from EIC and disseminate it to APEDA and the nominated laboratories.
		5.8	On the basis of analysis of data provided by the laboratories, the NRL shall prepare and organize a calendar of training and awareness programmes for the bee keepers, honey suppliers, processors and laboratories.

		5.9	The NRL shall prepare a calendar and organize training programmes on testing procedures, methods of analysis, etc for each contaminant or group of contaminants for the nominated laboratories.
		5.10	The NRL shall prepare a calendar and organize proficiency / inter-laboratory testing for the designated laboratories.
		5.11	In cases, where residue levels of drugs, pesticides and heavy metals are found to be higher than the permitted levels, it will issue "Internal Alert Information" as per format given in **Annexure-10**. This alert shall be issued without any delay. It will advise the exporters, APEDA and EIC/concerned EIA and nominated laboratories about the control measures required to be taken.
		5.12	In case, the samples on re-testing passes the MRL requirement, the NRL shall without delay revoke the Internal Alert information, which shall take effect on that date. In this regard, the NRL shall intimate all concerned about the new status.
6.	Powers of National Referral Laboratory	6.1	The NRL shall have the right to draw samples from honey collection centers, honey processing units and nominated laboratories.
		6.2	The NRL shall have the right to verify analysis data corresponding to the samples drawn and/or tested by the designated laboratories.
		6.3	The NRL shall have authority to recommend to APEDA and/or NABL, de-recognition of nominated laboratories in the event of non-compliance with the procedure for drawl of samples, testing of honey, etc.
7.	Responsibilities of EIC	7.1	To evaluate and send residue monitoring data to the European Commission.
		7.2	To evaluate the monthly and quarterly statements submitted by the nominated laboratories and NRL, respectively and suggest control measures.
		7.3	To keep APEDA and NRL informed of any information on excessive residues brought to their notice from any quarter.

		7.4	EIC shall utilize copies of test reports received from the laboratories (para 4.4) for the purpose of verification at the time of shipment of honey.
		7.5	To keep APEDA and NRL informed of any Government of India notifications on use of drugs, pesticides heavy metals and the maximum residue levels.
		7.6	To keep APEDA and NRL informed of any EU notifications or changes in the MRLs of residues of drugs, pesticides and heavy metals.
		7.7	Establish corrective measures in consultation with APEDA and NRL.
8.	Responsibilities of the honey processors / exporters	8.1	All registered exporters of honey shall provide to APEDA a list of honey processing units from where they would source honey for exports to the EU.
		8.2	Each honey-processing unit will maintain in Annexure-4, a record of the sources (farmers & suppliers) of honey in such a manner that the consignment exported can be traced back to the supplier of honey.
		8.3	The processing units shall allot a reference code number to each of its honey suppliers, which shall be mentioned on the sample slip.
		8.4	Processors shall source honey only in food grade plastic / stainless steel containers to avoid the migration problem of lead and other heavy metal.
		8.5	It shall be the responsibility of the processing unit to provide complete information about the honey supplier, batch number of the raw /processed honey to the nominated laboratories at the time of sampling. They will also be responsible to complete Annexure-5 in all respects at this stage.
		8.6	The processing units shall also maintain a record (as per Annexure-4). This record would be made available to the laboratory representative at the time of sampling.
		8.7	It will be the responsibility of the processor to ensure full cooperation to the authorized representative of the laboratories, who will carry out sampling as per the sampling plan under this document.

9.	Surveillance Mechanism	9.1	For an effective monitoring, APEDA will nominate a Committee consisting of representatives of honey exporters, designated laboratories and EIC/EIA under the leadership of National Referral Laboratory.
		9.2	To ensure implementation of control measures suggested by NRL.
		9.3	Assessment of the work carried out by NRL with respect to the responsibilities as laid down in this Plan.
		9.4	APEDA shall have the Authority to take suitable action against the processing units or laboratory as the case may be on receipt of any communication in regard to para 3.10 above.
10.	Penal Provisions	10.1	In the event of breach of this monitoring plan of drugs, pesticides and heavy metals residues in honey, APEDA may initiate action as per the provisions of section 19(3), Chapter-V of the APEDA Act, 1985 (Extract from APEDA Act is given in **Annexure-11**), in addition to the following: a) Cancellation of Registration-cum-Membership Certificate of exporters. b) Notifying to DGFT for cancellation of Import-Export Code number allocated to such exporters. c) Any other action as deemed fit.

Date: March 24, 2008 (Pravin Gupta)
Place: New Delhi General Manager

ANNEXURE – 1

LIST OF NOMINATED LABORATORIES

Sl. No.	Name and address of the laboratory	Status and sampling
1.	Indian Institute of Integrative Medicine (CSIR) (Formerly Regional Research Laboratory) Canal Road, Jammu Tawi – 180001 Tel: 0191-2573064 (Direct line) 2549084, 2549051 Extn: 298 Fax:0191-2543829 E-mail: **agarwalsg@yahoo.com** Contact Person : Dr. S G Agarwal, Scientist-F	National Referral Laboratory (NRL)
2.	Shriram Institute for Industrial Research 19, University Road, Delhi – 110 007. Tel:27257267, 9818360622 Fax: 27257676 E-mail: **sridlhi@vsnl.com** Contact Person : Dr. K M Chacko, Dy. Director	- Little Bee Impex - Kejriwal Bee Care - Dabur India Ltd - Jaina Honey - Apis India - Beez India
3.	Delhi Test House A-62/3, G. T. Karnal Road, Industrial Area Opp Hans Cinema Azadpur, Delhi 110 033. Tel : 27437327, 27435509, 27427672, Fax : 27435509 E-mail **: info@delhitesthouse.com** Contact Person : Mr. M C Goel, Director	- Kashmir Apiaries Exports - Kashmir Honey Trading
4.	Arbro Pharmaceuticals Limited 4/9 Kirti Nagar Industrial Area New Delhi – 110 015 Telefax: 011-25467228, 25927999, 25457922, 25457923 E-mail: **arbrolab@arbropharma.com** Contact Person : Dr. R.A. Singh, Director (Tech.)	- M B Exim Pvt. Ltd., - Shakti Impex - Brij Health Care - Great Apiaries - Pioneer Food

ANNEXURE-1A

POSTAL/E-MAIL ADDRESSES/ PHONE/ MOBILE / FAX NUMBERS (UNDER RMP-HONEY- '2008-09')

1.	**Agricultural and Processed Food Products, Export Development Authority** (**APEDA**), 3rd Floor, NCUI Auditorium Building, 3, Siri Instutional Area, New Delhi-110 016 (INDIA)	Mr. S. Dave, Director director@apeda.com Mr. Devendra Prasad, Assistant General Manager qmc@apeda.com	Tel: 011-26513162 Fax: 011-26519259 Tel: 011-26534175, Fax: 011-26519259 Mobile: **9873354788**
2.	**Export Inspection Council** (**EIC**) NDYMCA, Cultural Central Building, 3rd Floor, 1, Jai Singh Road, New Delhi-110 001 (INDIA)	Ms. Shashi Sareen, Director, eic@eicindia.org Mr. Anand Kishore, Joint Director jdtech@eicindia.org	Tel: 011– 3341263/ 23748189 23365540 Fax: 011-23748024
NATIONAL REFERRAL LABORATORY (H O N E Y)			
1.	Indian Institute of Integrative Medicine (CSIR) (Formerly Regional Research Laboratory) Canal Road, Jammu Tawi – 180 001 (INDIA)	Dr. S. G. Agarwal, Nodal Officer, agarwalsg@yahoo.com	Tel: 0191-2569022 (D), EPAB 0191-2569000-005 Extn: 298 Mob: **94191 53629** Fax: 0191-2569006

NOMINATED TESTING LABORATORIES			
1.	**Delhi Test House** A-62/ 3, G.T. Karnal Road, Industrial Area, Opp. Hans Cinema, Azadpur, Delhi-110 033 (INDIA)	Mr. M. C. Goel, Director, deltest@bol.net.in, info@delhitesthouse.com Mr. Dinesh Goel, Director, dg@delhitesthouse.com	Tel : 27437327, 27435509, 27427672, Fax : 27435509 Mob: **098104 42016**
2	**Shriram Institute For Industrial Research** 19, University Road, PB No. 2122, Delhi-110 007 (INDIA)	Dr. R K Khandal, Director, sridlhi@vsnl.com, rkhandal@shriraminstitute.org Dr. K. M. Chacko, Dy. Director, sridlhi@vsnl.com, kmchacko@shriraminstitute.org	Tel:27257267, Mob: **98183 60622** Fax: 27257676 Mob: **9818360622**
3	**ARBRO, Pharmaceuticals Ltd.,** 4/9, Kirti Nagar Industrial Area, New Delhi-110015 (INDIA)	Dr. R. A. Singh, Director (Technical), arbrolab@arbropharma.com, drsingh@arbropharma.com,	Tel: 011-45072316-18 45072346-47 Mob : **98106 42038** Fax : +91-11-45032722
EXPORT HOUSES/ PROCESSING UNITS			
1	**M/s Kashmir Apiaries Exports** G.T. Road, Doraha-141 421, Ludhiana, Punjab (INDIA)	Mr. Jagjit Singh Kapoor, Chief Managing Director, info@kashmirhoney.com, export@kashmirhoney.com	Tel: 01628-258240/258440 Mob: **98143 05080** Fax: 01628-258140
2	**M/s Little Bee Impex** G. T. Road, Doraha-141 421, Ludhiana, Punjab, (INDIA)	Mr. Gurcharn Singh, Chief General Manager, gurcharan.singh@kashmirhoney.com, export@littlebeeimpex.com	01628-258240/258640 Fax: 01628-259570

3	**M/s Apis India Natural Products** Village Bhoglan, Bhoglan Road, Rajpura-140 4 01, Punjab, (INDIA)	Mr. Vimal Anand, vimal@apisindia.com, vimal@hotmail.com, rameshbisht01@yahoo.co.in	011-2495-8970/2495-1270 Mob: **98100 99226** Fax: 011-2571-3631
4	**M/s Beez India Natural Products** A-7, Wazirpur Ring Road, Opp. Shalimar Bagh, Delhi-110 052, (INDIA)	Mr. Sunny Ahuja, richirichgroup@yahoo.co.in, info@beezhoney.com	Tel: 273763773/ 27373852 Mob: **98100 58038** Fax: 011-52473003
5	**M/s M. B. Exim (P), Ltd.,** Darpan Cinema Lane, Ambala Road, Saharanpur-247 001, U.P., (INDIA)	Mr. Rajesh Mehta, rment2003@yahoo.co.in	Tel: 0132-3095207 Fax: 0132-2641677 Mob: **98122 31477**
6	**M/s Shakti Impex** 55-59, E.P.I.P., Phase-II, Thana, Baddi-173 205, Distt. Solan, H.P., (INDIA)	Mr. Jai Gopal Goyal, blg_shakti33@sify.com, parminderfeb13@yahoo.com, rocklamba@yahoo.com	Tel: 01675-240024/ 245526 Mob: **93570 25000**/ **93169 10003** Fax: 01675-245526
7	**M/s Kejriwal Bee Care India (Pvt.) Ltd.,** W-42, Greater Kailash-II, New Delhi-110 048, (INDIA) **Processing Unit:** Village Jalalpur, P.O. Banur, Rajpura, Distt. Patiala, Zirakpur, Patiala Highway, Punjab, (INDIA)	Mr. N. M. Kejriwal, Chairman, amit@kejriwalgroup.co.in, kejriwal@mantraonline.com,	Tel: 011-2921-9677-79/ 2921-9984 Fax: 011-2921-0985 Unit: Tel:+91–1762–396135 Tele fax :+91–1762–251411
8	**M/s Jaina Honey & Natural Products** G-35, Brij Industrial Area, Bharatpur-321001, Rajasthan, (INDIA)	Mr. O. P. Jain, Director, jainasafe@gmail.com, jainasafe@hotmail.com jainasafe@yahoo.com	Mob: **094140 23668** **94149 44160** Fax: 5644-231329

9	**M/s Dabur India Limited** Kaushambi, Sahibabad-201 010, Ghaziabad, U.P., (INDIA)	Mr. S K Dwivedi, Manager Operation, dwivedisk@dabur.com	Tel: 95120-3982000 Fax: 95120-3001000
10	**M/s Brij Health Care** Village-Tehra Lodha, NH-11, Bharatpur Agra Highway, Bharatpur-321 001, Rajasthan, (INDIA)	Mr. Vinit Singh, brijhoney@gmail.com, brijhoney@hotmail.com	Tel: 05644-227800 Mob: **98285 23654** Fax: 05644-231755
11	**M/s Great Apiaries** PLOT KHASRA NO. 9/2/1/-8/1/2-9/1/2-9 Near Bamalipur Chowk, G. T. Road, Kot Sekhon, Khanna (Doraha), (Pin: 141 416) Ludhiana, PUNJAB (INDIA)	Mr. Hardev Singh greatapiaries@indiatime.com	Tel: 01628-291299 Mob: **94170-09433** Fax: 0161-2499849
12	**M/s Kashmir Honey Trading Co.** 8-A, G.T. Road, Mohan Nagar, Near MMX Multiplex, Mohan Nagar Ghaziabad -201 007, U.P., (INDIA)	Mr. Anjani Agarwal mvdphoney@yahoo.com	Tel: 0120-2659560 Mob: **098912 02768/** **93508 49888** Fax: 0120-4374838
13	**M/s. Pioneer Food & Agro Industries** Plot No. H-30, Kosi Kotwan Industrial Area Kosi Kalan Distt: Mathura, U.P.	Mr. Jagjit Singh Bhasin info@pioneerfood.co.in	Tel: 022-24312440, 24312662 Fax: 022-24221655

ANNEXURE - 2

PROCEDURE FOR SAMPLING AND TESTING OF HONEY
(TO BE FOLLOWED BY NOMINATED LABORATORIES AND NRL)

1. The laboratory shall follow the criteria laid-down in APEDA's scheme for laboratory recognition.

2. Sampling

2.1 Sampling of the honey shall be carried out by an authorized person of nominated laboratory at the processing plant or place of storage of raw or processed honey.

2.2 The method of sampling given in Annexure-3 shall be followed for testing of residues of drugs, pesticide and heavy metals in honey intended for exports.

2.3 The laboratories will obtain from the processing unit a copy of Annexure – 4 of this document and ensure that it is complete in all respects.

3. Method of Analysis

The method of analysis used for drugs, pesticides and heavy metals shall be determined by their MRLs established in this RMP. Following criteria shall be applied while selecting the analytical method:

(a) Published in books and manuals internationally accepted as the validated method, for example, AOAC.
(b) Capability of determining more than one residue for example multi-residue method
(c) Suitable for the commodity and at or below the specified MRLs

4. Conformance of the Sample

4.1 Residue of drugs, pesticides and heavy metals

4.1.1 Acceptance, if the laboratory sample does not exceed the MRLs prescribed in Annexure-6.

4.1.2 Rejection, if the laboratory sample exceeds MRLs prescribed in Annexure-6.

ANNEXURE – 3

METHOD OF SAMPLING FOR CHECKIING THE RESIDUE LEVELS OF DRUGS, PESTICIDES AND HEAVY METALS IN HONEY

(TO BE FOLLOWED BY NOMINATED LABORATORIES AND NRL)

1. PURPOSE AND SCOPE

Samples intended for checking of the levels of residues of drugs and pesticides in honey shall be taken according to the methods described below.

2. DEFINITIONS

Analytical Portion: A representative quantity of material removed from the analytical sample, of proper size for measurement of the residue concentration.

Analytical Sample: The material prepared for analysis from laboratory sample, by separation of the portion of the product to be analyzed.

Bulk Sample: The combined and well-mixed aggregate of the primary samples taken from a lot.

Laboratory Sample: The sample sent to, or received by, the laboratory (a representative quantity of the material removed from the bulk sample).

Lot: A quantity of a food material delivered at one time and known or presumed to have uniform characteristics such as origin, variety, producer, type of packing, marking, packer, consignor etc.

Primary Sample: One or more units taken from one position in a lot.

Unit: A smallest discrete portion in a lot, which should be withdrawn to form a whole or a part of a primary sample.

Batch: A quantity of raw or processed honey, which have been prepared under the same conditions and in particular treated in single continuous operation.

3. GENERAL PROVISIONS

3.1 Personnel

Sampling shall be performed by an authorized person of the nominated laboratory.

3.2 Material to be sampled

Honey samples will be drawn from different batches on a random basis as per the sampling plan given in Section 4.0.

3.3 Precaution to be taken

In the course of sampling and preparation of the laboratory sample, precaution must be taken to avoid any contamination or changes in the sample, which would affect the residue, the analytical determination or make the laboratory sample not representative of the bulk or final sample. As far as possible, the primary sample should be drawn from various places distributed throughout the batch/lot.

3.3 Collection of primary sample

3.3.1 The minimum number of primary samples taken from the batch/lot is determined as per the following procedure:

1.	Raw honey (Number of containers per lot) Up to 25 26 - 100 101 - 200 201 – 300 301 – 400 >400	Minimum primary samples to be taken from a lot of raw honey (square root of number of containers) 5 10 15 18 20 min. 25
2.	Processed / packaged honey (number of containers per batch) Up to 25 26 - 100 101 - 200 201 – 300 >300	Minimum primary samples to be taken from a batch of processed honey (cube root of number of containers) 3 4 5 6 min. 10

(*) Each primary sample shall be taken from a randomly chosen position in a lot, as far as practicable. The primary sample must consist of sufficient material to provide the laboratory samples required from the lot.

3.3.2 Each primary sample will be minimum 0.5 kg.

3.4 Requirements for sampling

3.4.1 Material required for sampling

- Stainless steel sampling rod
- Clean food grade containers
- Disposable gloves
- Sealing wax
- Thread
- Labels
- Cloth
- Laboratory seal

3.4.2 Label details

- Name of processor
- Lot / batch number
- Date of sampling
- Type of honey (raw or processed)
- Signature of representative of laboratory and processor

3.5 Preparation of bulk sample

The primary samples shall be combined and mixed well to form the bulk sample.

3.6 Preparation of laboratory sample

The bulk sample should be divided into three parts to provide three representative samples. Each of the three parts will be packed in appropriate containers, sealed and signed by the representatives of the laboratory and the processor. One sample will be retained by the processor and the other two samples will be brought back by the laboratory representative (one for analysis and the other as control). The control sample will have to be preserved by the laboratory and the processor for 90 days from the date of sampling.

3.7 Sampling record

The sampling record (**Annexure-5**) will be maintained both by the processor and the laboratory.

3.8 Packaging and transmission of laboratory sample

The laboratory sample must be placed in a clean, food grade container, which provides secure protection from contamination, damage and leakage. The container shall be sealed securely, labeled and the sampling record shall be attached.

3.9 Preparation of analytical sample

The laboratory sample shall be given a unique identification, which, together with the date of receipt and the sample size, should be added to the sample record. The part of the commodity to be analyzed i.e. analytical sample shall be separated as soon as practicable.

3.10 Storage condition for the control samples

The control sample shall be preserved of cool and dark storage area.

3.11 Criteria for determination of compliance

Analytical results derived from laboratory samples taken from the lot must be supported by acceptable quality control data (example for instrument calibration and pesticide recovery refer Codex Standards) results should not be corrected for recovery where the residue is found to exceed MRL. Its identity should be confirmed and its concentration must be verified by analyzed and one or more additional analytical portions derived from the original laboratory sample.

- The MRLs given complies to the samples
- The lot shall be taken as compliance with the MRLs where MRLs is not exceeded by the analytical results
- Where results for samples exceeds the MRLs, the decision with the lot is non-compliance must be taken into account; the results obtained from one or more laboratory sample, as applicable; and the accuracy precision of analysis as indicated by the supporting quality control data

3.12 On condition that the given lot is representative in nature, primary samples shall be drawn as given in the Clause 3.3 above.

3.13 Each of the primary samples collected from a lot shall be combined and mixed well to form a bulk sample as given in Clause 3.3 above.

3.14 Laboratory sample shall be prepared from bulk samples as per Clause 3.5 above.

3.15 Sample records shall be prepared as referred in Clause 3.6 above. On receipt of sample at laboratory, analytical sample shall be separated while analytical portion is stored as per Clause 3.9 above.

4. SAMPLING PLAN FOR 2008- 09

MONTHS	1 KASHMIR APARIES		2 LITTLE BEE		3 APIS		4 BEEZ		5 M B EXIM		6 SHAKTI		7 JAINA		8 BRIJ		9 KASHMIR TRADING		10 DABUR		11 KEJRIWAL		12 GREAT APARIES		13 PIONEER FOOD		TOTAL SAMPLES
	RAW	PRO	RAW	PRO	RAW	PRO	RAW	PRO	RAW	PRO	RAW	PRO	RAW	PRO	RAW	PRO	RAW	PRO	RAW	PRO	RAW	PRO	RAW	PRO	RAW	PRO	
APRIL 08	54	18	27	9	18	6	6	2	30	10	24	8	3	1	6	2	24	8	0	0	9	3	6	2	6	2	284
MAY 08	42	14	21	7	12	4	6	2	30	10	15	5	3	1	3	1	18	6	0	0	6	2	3	1	6	2	220
JUNE 08	42	14	21	7	12	4	6	2	15	5	15	5	3	1	3	1	6	2	0	0	6	2	3	1	3	1	180
JULY 08	42	14	21	7	12	4	6	2	15	5	15	5	3	1	3	1	0	0	0	0	6	2	3	1	3	1	172
AUG 08	42	14	21	7	12	4	6	2	0	0	15	5	3	1	3	1	0	0	0	0	6	2	3	1	3	1	172
SEPT 08	42	14	21	7	12	4	6	2	0	0	15	5	3	1	3	1	0	0	3	1	6	2	3	1	0	0	152
OCT 08	42	14	21	7	12	4	6	2	9	3	15	5	3	1	3	1	0	0	0	0	6	2	3	1	0	0	152
NOV. 08	42	14	21	7	12	4	6	2	9	3	15	5	3	1	6	2	0	0	0	0	6	2	3	1	3	1	170
DEC. 08	60	20	30	10	18	6	6	2	30	10	24	8	3	1	6	2	0	0	0	0	9	3	6	2	24	8	288
JAN 09	60	20	30	10	18	6	6	2	45	15	24	8	3	1	6	2	18	6	3	1	9	3	6	2	24	8	322
FEB 09	60	20	30	10	18	6	6	2	45	15	24	8	3	1	6	2	24	8	0	0	9	3	6	2	24	8	340
MARCH 09	60	20	30	10	18	6	6	2	45	15	24	8	3	1	6	2	30	10	0	0	9	3	6	2	24	8	348
TOTAL	588	196	294	98	174	58	72	24	273	91	225	75	36	12	54	18	120	40	6	2	87	29	51	17	120	40	
GRAND TOTAL		784		392		232		96		364		300		48		72		160		8		116		68		160	2800

TOTAL NUMBER OF SAMPLES TO BE DRAWN AND TESTED (EXPECTED) = 2800

RAW = RAW HONEY
PRO = PROCESSED HONEY

5. For NRL

5.1 5% of the samples drawn by the nominated laboratories will be sampled and tested by the NRL. The batch number will be indicated by the NRL to the units for the samples to be verified directly by the NRL with reference to reports submitted by the designated laboratories to the NRL.

5.2 2% of the samples drawn by the NRL directly from the registered honey suppliers to ascertain that the limits established at Annexure-6 for drugs, pesticides, carbamates and heavy metals are adhered to. The NRL shall analyze these samples and report as per the format given in Annexure-7, for the purpose of consolidation of data.

ANNEXURE-4

RECORD OF THE SOURCES (FARMERS & SUPPLIERS) OF HONEY
(TO BE MAINTAINED BY THE EXPORTERS)

01.	Registration No./Code No. of the raw honey supplier	:
02.	Name of the raw honey supplier	:
03.	Postal Address	:
04.	Contact person	:
05.	Phone Number	:
06.	Number of bee hives/population	:
07.	Likely production in the year 2007	:
08.	Variety (region flora specific)	:
09.	Name of Medicines etc. used	:
9.1	Date of administering	:
9.2	Dose, concentration administered	:
10.	Means of harvest/primary extraction	:
11.	Means of storage of raw honey	:
12.	Means of transport to the honey processing unit	:
13.	Remarks	:

Date :
Place :

Signature of authorized person of the bee keeper/ honey supplier

Name :
Address :

Signature of authorized person of the honey processor

Name :
Address :
EIC/EIA Registration No. of Unit

ANNEXURE-5

SAMPLE SLIP FOR RAW AND PROCESSED HONEY
(to be prepared and maintained by the processor and laboratory)

Sample Slip No._____

No.	Particulars	Details to be filled
1)	APEDA Registration No. of the exporter	
2)	EIC/EIA Registration No. of the unit	
3)	Name & address of the honey processing unit	
4)	Supplier Code/Registration No.	
5)	Address of the supplier	
6)	Variety	
7)	Raw Honey / Processed Honey	
8)	State and District from where raw honey harvested	
9)	Lot / Batch Number of the produce	
10)	Date of honey harvest	
11)	Date of honey processing	
12)	Packaging description (size and numbers)	
13)	Date of sampling	
14)	Place of sampling	
15)	Names of drugs, pesticides and heavy metals along with concentration, if any, ever fed to honey bees.	

DECLARATION

1. I/We, hereby, declare that the raw honey received from the above mentioned supplier(s) only will be used for processing for export to the European Union and that no other honey will be mixed with it.
2. I/We also declare that in case any of the above samples contain residue of drugs or pesticides in excess of the prescribed levels, it would not be processed or mixed with honey produced for export to the EU.
3. I/We, hereby, declare that Annexure-4 has been properly maintained in respect of this sample and the information has been produced before the laboratory representative for verification.
4. I/We have received a counter sample covered by sample slip in sealed and signed conditions and the same will be retained for 90 days from this date.

Date :
Place :

Signature of Exporter/
Processing Unit
(Name of Exporter)

CERTIFICATE

This is to certify that I have personally drawn this sample from the premises of the above mentioned honey processing unit from the batches of raw and processed honey by adopting the procedure given in Annexure-2 and method of sampling given in Annexure-3 of the Residue Monitoring Plan for exports of honey to EU. I have also obtained a copy of the document as per Annexure – 4, duly filled, from the exporter/processing unit.

Date :
Place :

Signature :
Name of authorized representative :
of Nominated Laboratory & address

ANNEXURE – 6

DRUGS & PESTICIDES FOR MONITORING RESIDUES IN HONEY
(TO BE FOLLOWED BY NOMINATED LABORATORIES AND NRL)

S.No.	Compounds	Unit	EU MRLs
1.	Drugs a) Chloramphenicol*	- -	 Absent
	b) Nitrofurans** • Furazolidone [AOZ) • Furatadone [AMOZ] • Nitrofurantoin [AHD] • Nitrofurazone [SEM]	-	Absent
	c) Sulphonamides • Sulfadimidine • Sulfadiazine • Sulfadimethoxine • Sulfadoxine • Sulfamerazine • Sulfanilamide • Sulfamethoxypyridazine • Sulfamethoxazol • Sulfathiazol • Trimethoprim	ppb	20
	d) Streptomycin	ppb	10
	e) Tetracyclines • Tetracyclin • Oxytetracyclin • Chlortetracyclin • Doxycyclin	ppb	10
2.	Organochlorine compounds • Chlorobenzilate • Hexachlorobezene (Benzenehexachloride) • pp – DDT • op-DDT • pp –DDE • pp-DDD • alpha-HCH • beta-HCH • Lindane	 ppb ppb ppb ppb ppb ppb ppb ppb ppb ppb	 20 5 25 25 25 25 5 5 5 10

	• Vinclozolin		
3.	Organophosphorus compounds • Coumaphos • Malathion • Phosalone	 ppb ppb ppb	 50 20 20
4.	Pyrethroids • Cyfluthrin • Cypermethrin • Deltamethrin • Permethrin • Fenvalerate • Fluvalinate • Cyhalothrin	 ppb ppb ppb ppb ppb ppb ppb	 7 17 17 17 17 7 7
5.	Carbamates • Carbofuran • Propoxeur • Carbaryl	 ppm ppm ppm	 0.10 0.01 3.00
6.	Miscellaneous • Cymiazol • Amitraz • Brompropylat • Chinomethionat	 ppb ppb ppb ppb	 500 100 50 20
7.	Heavy Metals • Lead • Copper • Cadmium • Mercury	 ppb ppb ppb ppb	 80 1000 8 10

Minimum required performance limit (MRPL)

*Chloramphenicol 0,3 ppb
**Nitrofurans 1 ppb for all

ANNEXURE-7

FORMAT FOR THE TEST CERTIFICATE
(TO BE FOLLOWED BY NOMINATED LABORATORIES TO APEDA, EIC AND NRL)

Certificate No. _____

Date : _____

1) Name and Address of the Exporters
2) Address of the Unit
3) EIC/EIA Registration No. of the Unit
4) Name of raw honey supplier
5) Registration/Code Number of raw honey supplier
6) Product

   a) Raw honey
   b) Processed honey

7) Lot / Batch No.
8) Quantity of the lot / batch produced
9) Packing description (size and numbers)
10) Sampling

- Procedure followed
- Quantity of sample taken
- Place of sampling
- Date of sampling

11) Tests

- Date of start of analysis _____ completion of analysis _____

Drug or Pesticide Residue Name	Residue levels found in the sample	MRLs	Limits of Detection (LoD)	Method of Testing	Conformity

CERTIFICATE

1) This is to certify that the sample was drawn by our authorized representative from the storage of raw honey/processing units having Registration No. _____ and have been analysed by us. The sample was tested for residues of the drugs, pesticides and heavy metals as mentioned above and the residue content in the sample is as given in Column 3 of the table given above.

2) The APEDA recognition of this laboratory is valid as on date.

3) The sample collected from _____ meets the MRLs - **YES/NO**

4) If no, give reasons

Name of Analyst &
Signature

Authorized Signatory &
Seal of the Laboratory

ANNEXURE-8

MONTHLY STATEMENT TO NATIONAL REFERRAL LABORATORY, APEDA & EIC
(TO BE SUBMITTED BY THE NOMINATED LABORATORIES
BY THE 5th DAY OF THE FOLLOWING MONTH)

Date :

Period of Testing :

Name of the unit/ Exporter Address	Date of Sampling	Batch No.	State and District	Nature of sample	Date of comple-tion of testing	Results (conformed or not conformed) as per EU requirements	Remarks in case of non-confor-mance

Signature of Authorized Signatory
of Nominated Laboratory

ANNEXURE-9

QUARTERLY CONSOLIDATED STATEMENT OF TEST REPORTS (HONEY)

(TO BE SUBMITTED BY NATIONAL REFERRAL LABORATORY TO APEDA & EIC)

Reports received during this period							
Name and address of the unit							
Place of testing							
Products	Raw /Processed Honey						
Number of batches	[ ] Months/Quarterwise ➔ 1st 2nd 3rd 4th			January April July October	February May August November	March June September December	Total
Number of samples tested	[ ]	Nos.	Wt. in kg				Nos
	Raw						[kg]
	Passed						
	Failed						
	Processed						
	Passed						
	Failed						
Sampling procedure followed	APEDA Guideline, Annex-3 of RMP Document Dated 24.3.2008						
Name of drugs and pesticides tested	APEDA Guideline, Annex-6 of RMP Document Dated 24.3.2008						

Sl. No.	Batch No.	Batch Size (kg)	Name of Drugs, Pesticides and Heavy Metals*	Residue Levels Found as per EU (μg/kg) ppb	MRLs As per EU (μg/kg) ppb	Method of Testing	Compliances (Yes) Non-Compliance (No); (Internal Alert Information Number)	Date of Analysis Completion
		Raw					Raw	
1.								
2.								
		Processed					Processed	
3.								
4.								

* Rest Drugs, Pesticides and Heavy Metals not detected/ below limits of MRL as per Annexure 6 of RM Honey dated 24.3.2008

Place : IIIM (CSIR) Jammu Tawi

Date :

Signature of the authority of
National Referral Laboratory

ANNEXURE-10

INTERNAL ALERT INFORMATION

(TO BE ISSUED BY NATIONAL REFERRAL LABORATORY)

Tel: 0191-2573064, 2549084,2549051,Fax:0191-2548607

e-mail: agarwalsg@yahoo.com

Alert Information No……	Original

Page: No__ of ___Pages

Sub: Detection of _____ drugs/pesticides/heavy metals beyond MRLs

1. Raw Honey :
2. Processed Honey :
3. Name of honey processing unit :
4. APEDA Registration No. of the exporter :
5. EIC/EIA Registration No. of Unit :
6. Name of raw honey supplier
7. Registration/Code No. of raw honey supplier :
8. Code Number of the produce, if any :
9. Date of honey processing :
10. Date of sampling :
11. Place of sampling ☐ Collection centre

    ☐ Processing unit
12. Date of analysis :
13. Findings of the analysis

    _____

    _____
14. Recommendations by National Referral Laboratory

    _____

    _____

Date :
Place :

Signature of the Authorized
Signatory of the National Referral
Laboratory along with seal

Copies to :

1. Honey processor/exporter
2. All nominated laboratories
3. Honey Bee Board
4. APEDA, New Delhi
5. EIC
6. Exporters' association

ANNEXURE-11

EXTRACT FROM APEDA ACT

REGISTERED No. D-(D)-72

The Gazette of India
EXTRAORDINARY
PART II – Section 1
MINISTRY OF LAW AND JUSTICE
(Legislative Department)
New Delhi, the 9th January, 1986/Pausa 19, 1907 (Saka)

The following Act of Parliament received the assent of the President on the 8th January, 1986, and is hereby published for general information: -

THE AGRICULTURAL AND PROCESSED FOOD PRODUCTS EXPORT DEVELOPMENT AUTHORITY ACT, 1985

No. 2 OF 1986

[8th January, 1986]

An Act to provide for the establishment of an Authority for the development and promotion of exports of certain agriculture and processed food products and for matters connected therewith.

CHAPTER-V

Power to prohibit or control imports and exports of Scheduled products

CONTROL BY THE CENTRAL GOVERNMENT

19 (1) The Central Government may, by order published in the Official Gazette, make provision for prohibiting, restricting or otherwise controlling the import or export of the Scheduled products, either generally or in specified classes of cases.

(2) All Scheduled products to which any order under sub-section (1) applies, shall be deemed to be goods of which the export has been prohibited under section 11 of the Customs Act, 1962, and all the provisions of that Act shall have effect accordingly.

(3) If any person contravenes any order made under sub-section (1), he shall, without prejudice to any confiscation or penalty to which he may be liable under the provisions of the Customs Act, 1962, as applied by sub-section (2), be punishable with imprisonment for a term which may extend to one year, or with fine, or with both.

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