

No. AC 2304/ 112



National Bureau of Agricultural  
Commodity and Food Standards,  
50 Pahol-yothin Road,  
Bangkok 10900, Thailand

13 January 2017

Mr D. K. SINGH  
Agricultural and Processed Food Products Export Development Authority (APEDA)  
Ministry of Commerce and Industry  
Government of India  
August Kranti Marg, New Delhi 110016

**Subject: Visit Assessment Report**

**Enclosure: Visit Assessment Report (office and on-sites assessment) on 21-25 November 2016**

Dear Chairman,

Refers to the visit assessment by National Bureau of Agricultural Commodity and Food Standards (ACFS) on 21-25 November 2016, aimed to evaluate the aflatoxin control measure of peanut kernel exporting to Thailand comply with Thai Agricultural Standard (TAS) 4702. The enclosed report had been done for this matter and already amended by your side.

In this regard, we would like to inform you that we have acknowledged the inspection and certification control systems for export of peanut kernel developed by APEDA demonstrated the efficiency to control the maximum aflatoxin level not exceeding the importing country's requirements and traceability. Thus, in the view of TAS 4702, the control measure for maximum level of aflatoxin indicates that the production system of raw peanut kernel has been complied with the conditions and legal basis of the standard.

Finally, we are appreciated for your kind cooperation and all arrangements that had been made for facilitating ACFS team. Should you have any queries, please feel free to contact us.

Yours faithfully,

A handwritten signature in blue ink, appearing to be 'Doojduan Sasanavin', with the date '10 Jan 2017' written below it.

(Ms Doojduan Sasanavin)  
Secretary General

National Bureau of Agricultural Commodity and Food Standards

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**National Bureau of Agricultural Commodity and Food Standards  
(ACFS)**

**VISIT ASSESSMENT REPORT  
(Office and On-Sites Assessment)**

**Agricultural and Processed Food Products Export Development Authority  
(APEDA)  
Republic of India**

**21-25 November 2016**

## 1. Objective of the Visit

The objectives of this visit is to evaluate whether the control measure and delivery of peanut kernel production, collection, and storage for exportation conducted under APEDA jurisdiction is equivalence to Thai Agricultural Standard (TAS) 4702 Peanut Kernel : Maximum Level of Aflatoxin

**2. Commencing Date:** 21-25 November 2016

## 3. Venue:

3.1 Agricultural and Processed Food Products Export Development Authority (APEDA)  
3<sup>rd</sup> & 4<sup>th</sup> Floor, NCUI Building 3, Siri Institutional Area, August Kranti Marg,  
New Delhi 110 016

3.2 Fishfa Agri World  
Survey No. 52, At, Surya Rampara, 8 KM from Kuvadva Wankaner Chowk, Kuvadva  
Wankaner Main Road, Rajkot 360 003 (Gujarat)

3.3 Bhagwati Seeds  
Plot No. 188, "H" Road , Gidc Kuvadva, National Highway 8-B, Dist. Rajkot - 360023,  
Gujarat, India

3.4 JKT Enterprise PVT. LTD, Navi Mumbai  
Plot A 787/2/2, TTC Industrial Area, Khairne, Navi Mumbai 400 703

3.5 MiroChem Silliker Private Limited, Navi Mumbai  
A-513, TTC Industrial MIDC, Mahape, Navi Mumbai 400 701

3.6 National Research Center for Grapes (NRCG), Mumbai  
P. O. Manjri Farm, Pune 412 307, India

## 4. Assessors

*Lead Assessor:* Mr Yuthana Norapoompipat, Office of Standards Accreditation, ACFS

*Assessors:*

1. Ms Maneeporn Sungkarom, Office of Standards Accreditation, ACFS
2. Dr Pattanan Kasemweerasan, Office of Standards Accreditation, ACFS
3. Dr Abhichartbut Rodyoung, Office of Standards Accreditation, ACFS
4. Mr Aegkachai Supprawat, Division of Standards Control, ACFS
5. Mr Ramet Sae-lhao, Department of Agriculture

## 5. APEDA Delegate

1. Mr Sunil Kumar, Director
2. Dr Tarun Bajaj, General Manager
3. Mr Devendra Prasad, Deputy General Manager
4. Mr M.P. Vijay, Assistant General Manager

## 6. Scope

The area of this assessment was focused on aflatoxin level and control measures for dried peanut kernel at premises including trader for exporting to Thailand

## 7. Criteria for the Evaluation

The evaluation was conducted based on the following documents:

- Thai Agricultural Standard (TAS) 4702: Peanut Kernel: Maximum Level of Aflatoxin
- Notification of the National Bureau of Agricultural Commodity and Food Standards. The criteria and condition for licensing the certification bodies-specific certification scheme for agricultural products in accordance with the Thai Agricultural Standard for Peanut Kernel: Maximum Level of aflatoxin

- Notification of the National Bureau of Agricultural Commodity and Food Standards Subject: the Criteria and Condition for Licensing the Certification Bodies – General Certification Scheme for Agricultural Products.
- Procedures for export of peanuts and peanut products
- Criteria for grant of registration certificate to peanut processing units, integrated peanut processing units for export
- Criteria for grant of registration certificate to peanut shelling units, grading units and shelling-cum-grading units for export
- Criteria for grant of registration certificate to peanut godowns/storage for export

## **8. Assessment process**

The assessment activities were conducted by verification of the information gained from the review of the documents submitted by APEDA and the actual operation and management of the organisations and agencies concerned during the visit.

## **9. Assessment Findings**

The findings from verification of inspection and certification systems of APEDA are followings:

### ***9.1 Organisation and Legislation***

Agricultural and Processed Food Products Export Development Authority (APEDA) is a Competent Authority under Department of Commerce, Ministry of Commerce & Industry Government of India established under the Agricultural and Processed Food Products Export Development Authority Act passed by the Parliament in December, 1985. The Act (2 of 1986) came into effect from 13th February, 1986 by a notification issued in the Gazette of India: Extraordinary: Part-II [Sec. 3(ii): 13.2.1986].

A Notification No. 28 (RE-2012)/2009-2014 on 3<sup>rd</sup> January 2013 issued under the Section 5 of the Foreign Trade (Development & Regulation) Act, 1992. The notification was published in the Gazette of India authorised power to APEDA permitting export of peanuts subject to registration with APEDA along with controlled aflatoxin level certificate issued by APEDA recognised laboratories.

Mr D.K. Singh, Chairman, APEDA is the Head of the organization. The Processed Food Division responsible for implementation of Peanut & Peanut Products Export Regulation, testing of consignment and issuance of Certificate of Export (COE), monitoring export of peanut and peanut products through Peanut.Net system. Mr Sunil Kumar, Director, APEDA is head of this division. The Quality Division responsible for implementation of scheme for recognition of laboratories and certification bodies, development of export procedures for implementation of various export regulations including peanut. Mr Tarun Bajaj, General Manager, APEDA is head of this division.

In addition, APEDA also has 5 regional offices located at Mumbai, Hyderabad, Kolkata, Bangalore and Guwahati.

### ***9.2 Control Measures, Inspection and Certification System of Peanut Kernel for Exporting***

#### ***9.2.1 Shelling units/Grading units/Godowns or Storage/Integrated units***

All peanut processing units intending to export shall be registered by APEDA. The peanut kernel producers or operators will implement GMP/HACCP according to the peanut & peanut products regulation and procedure then apply to be registered units by APEDA through Peanut.Net system. APEDA will appoint auditors which comprised of delegate from APEDA, State Government and Directorate of Groundnut Research (DGR). The processing units comply with the procedure will be granted the certificate of recognition by APEDA. The certificate will be signed by electronic signature of the authorised person and QR code has been used for traceability.

At the present of visiting, there are 141 units registered or recognised by APEDA, of which, most of them have been certified according to HACCP/ISO 22000 by accredited certification bodies.

Regarding to visit the integrated units: Fishfa Agri World, Bhagwati Seeds and JKT Enterprise, it has been found that all of them have implemented the operating systems compliance to APEDA procedure. Those integrated units have modern/advance machines for grading or sorting the defected peanut kernel. The defected peanut kernel was separated and clearly indicating. The finished peanut kernel products were placed on pallets and stored in appropriate place that can control moisture and preventing from pest. The integrated units demonstrated the effective and efficiency control system controlling the aflatoxin level not exceed the requirement of the importing countries and also have been certified HACCP/ISO 22000.

In addition, National Plant Protection Organisation (NPPO) is an agency responsible for issuance of Phyto Sanitary Certificate (PSC)

### *9.2.2 Trader or Exporter*

The exporter shall registered by APEDA through online registration facility under Peanut.Net system. The exporter or trader shall buy peanut kernel from the recognised processing units only. Every consignment shall be tested aflatoxin by authorised laboratories. The exporter will get the certificate of export (COE) only when the aflatoxin level met the importing country requirement. The certificate of export (COE) will be issued by authorised person and signed by electronic signature. Also, the QR code has been used for traceability.

### *9.2.3 Recognised Laboratories, Monitoring and Verification*

To be authorised laboratories for aflatoxin analysis, the laboratories shall be ISO/IEC 17025 scope of aflatoxin analysis, accredited by national accreditation body, namely National Accreditation Board for Testing and Calibration Laboratories (NABL) and apply to APEDA. APEDA will appoint the audit committee which comprised of APEDA representative, external assessors drawn from NABL panel and National Referral Laboratory (NRL) to evaluate the compliance to the scheme for laboratory recognition. The recognised laboratories will be issued certificate "Recognition of Laboratory for Export Testing" valid for 4 years. The recognised laboratories are listed on Peanut.Net system and will be updated from time to time. At present, there are 20 recognised laboratories appeared on the website. These laboratories are surveillanced every two years.

The recognised laboratories are authorised for sampling and aflatoxin analysis. The authorised laboratory will draw peanut kernel at processing units or godown/storage units. The sample will be sent to the laboratory immediately and analyse aflatoxin by using validated method which is defined by National Referral Laboratory (NRL). The testing result meet the aflatoxin level of the importing country, the laboratory will issue "Certificate of Analysis" (COA) through Peanut.Net system. The exporter then can apply for COE.

Regarding to MicroChem Silliker Private Limited visiting, it has been found that the laboratory has been accredited to ISO/IEC 17025 scope for aflatoxin analysis by NABL and has recognition certificate by APEDA. Top management of the laboratory is Ms Vidhya Gangar. The lab participated in Proficiency Testing (PT) Program on 5<sup>th</sup> October 2015 provided by NRL, the result showed satisfactory. The method for drawing sample is based on Codex, the method of aflatoxin analysis is AOAC 2005.08 which is confirmation method using HPLC or LC-MS/MS. The MicroChem sends monthly summary report and 6 monthly reports to NRL. The lab is surveillanced by NABL every year and every two years by audit committee (APEDA & NRL).

Therefore, as mentioned above, the findings from interview and record verification shows that the laboratory performs high standard competency, maintains the standard ISO/IEC 17025 very well and comply with APEDA/NRL procedure.

The National Research Center for Grapes (NRCG) is designated as national referral laboratory for aflatoxin analysis and responsible for monitoring performance of those recognised laboratories. NRL regularly conducts Proficiency Testing (PT) Program of aflatoxin analysis for the recognised laboratories. Additionally, NRL monitors testing results from the authorised laboratories by doing aflatoxin analysis by randomly sampling peanut kernel sample derived from the recognised laboratories (2%). NRL informs APEDA to withhold the consignment if the result shows exceeding aflatoxin level and follow up the correction and prevention of the recognised laboratory. NRL submits annual report to APEDA in April every year.

### **9.3 Facilities**

The Peanut.net software system was developed by APEDA and has been implemented for last 5 years to facilitate exporting peanut and peanut products. It is effective and practical for all users; processing units, exporters, authorised laboratories and authorised person of APEDA. For examples, it has been used for application for recognition for peanut kernel processing units, onsite audit and results, afltoxin testing result, issuance certificate of recognition of peanut kernel processing units and certificate of export (COE) by APEDA. The information contained in COE is adequate for tracing back to certificate of analysis, the lot number of the consignment and the exporter. The lists of recognised peanut kernel processing units and recognised laboratories are shown on APEDA website and updated from time to time. The QR code presented in the certificates can be traced back directly to Peanut.net database.

### **10. Conclusion**

As per the findings, it can be concluded that the inspection and certification control systems for export of peanut kernel developed by APEDA demonstrated the efficiency to control the maximum aflatoxin level not exceeding the importing country's requirements and traceability. Therefore, it can be inferred that the aflatoxin control measures of APEDA are equivalent to aflatoxin control measure of Thai Agricultural Standard (TAS) 4702 Peanut Kernel: Maximum Level of Aflatoxin.

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