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Policy and Processes that Enable Honey Export

A Case Study from India

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Executive Summary

Studies on the policy and processes that enabled India to export honey to the international market have been conducted with the aim of documenting information on how India has adopted the policies, processes, standards and guidelines of the Codex Alimentarius and the European Directive on honey; and to formulate recommendations that can be used by other countries of the region to gain access to the international market, or be allowed to export their honey to it. India started exporting a small amount of honey in 1991-1992 and has now established itself as an important honey exporter to the world market. The quantity exported has increased substantially, and today India exports honey to 62 countries, including Germany, Saudi Arabia, the United States, and the United Kingdom.

The import and export of agricultural and associated products to and from India is supported by the Agricultural and Processed Food Products Export Development Authority (APEDA), which also offers various incentives and forms of financial assistance to the exporters of agricultural food products, including honey. The Indian Government provides various incentives for beekeeping development and for promoting the export of honey, and set up the National Beekeeping Board (NBB) in 1994. In India, beekeeping research is organised under the All India Coordinated Project on Honeybees and Pollinators, which has centres all over the country. The Khadi and Village Industry Commission is another official organisation with centres throughout India that is engaged in research, training, and extension in beekeeping.

As far as international trade is concerned, all member countries generally accept standards set by the Codex Alimentarius Commission (CAC). India has also adopted the Codex Alimentarius, and accordingly, the 'Codex India'. The National Codex Contact Point (NCCP) functions within the Directorate of Health Services, under the Ministry of Health and Family Welfare, the Government of India, to coordinate and promote Codex activities in India. Indian exporters must adopt the Codex Alimentarius or the standard of the importing country. The domestic consumption of honey is regulated by the Prevention of Food Adulteration Rules (PFA), 1955.

The Codex Alimentarius Commission has laid down 15 parameters relating to standards for honey. For example, the moisture content in honey (except heather honey) should not be more than 20 %. Sucrose content, which is also an indication of adulteration, should not be more than 5 g per 100 g of honey. There are also standards for contaminants that pose a hazard to human health, such as heavy metals and residues of pesticides and veterinary drugs.

The EU regulates honey under Council Directive 2001/110/EC. EU compositional requirements or standards for moisture content, sugar content, HMF, electrical conductivity, diastase activity, and physico-chemicals are the same as those of the CAC. The EU has adopted legislation on the use and monitoring of veterinary drugs and has listed substances considered safe for use on bees. These substances include formic acid, phenol, fluvalinate, thymol and menthol, oxalic acid, and lactic acid. No maximum residue levels (MRLs) for antibiotics in honey have been given by the EU, which means the EU does not allow the use of antibiotics for treatment of honey bees. But EU member states do import honey, and for regulating residues in honey the EU has set provisional MRLs of 25 ppb for oxytetracycline, 0.3 ppb for chloramphenicol, and 1.0 ppb for nitrofurans.

The Directorate General of Health Services, Ministry of Health and Family Welfare, has been designated as the nodal ministry for liaison with the CAC. The National Codex Contact Point as well as the National Codex Committee, constituted by the Ministry of Health and Family Welfare to keep liaison with the CAC, have been functioning since 1971. The National Codex Contact Point acts as the liaison office to coordinate with the other concerned government departments (at central and state level) , food industry, consumers, traders, research and development institutions and academia, through the National Codex Committee to ensure that the government is advised on policy and technical issues raised in the context of the CAC.

The quality of products exported from India is monitored by the government through the Department of Commerce and the Ministry of Commerce and Industry under the Export Inspection Council of India (EIC) Act. The signing of the WTO agreement by its member countries in April 1994 which came into force in January, 1995 has necessitated the need for quality and safety standards for food products for international trade.

To ensure quality and safety standards, there has been a shift in the approach of food regulators all over the world from final product testing to the process which controls these standards through safety systems such as ISO 9000, ISO 22000, and the Hazard Analysis Critical Control Point (HACCP) system. In the light of these developments, the EIC has published Executive Instructions for the quality control and inspection of honey, which undergoes revision as necessary. The main aim of this document is to keep a check on honey quality at all steps.

The Executive Instructions define procedures for the approval of the establishments set up to export honey, technologists working in such establishments, and renewal of the establishments' licences. These establishments are supposed to maintain good hygiene practices (GHP), good manufacturing practices (GMP), and the Hazard Analysis Critical Control Point (HACCP) system based on their own system of checks. Quality control parameters have also been defined. The Government of India has developed a plan to maintain traceability records along with a residue monitoring plan. The Traceability and Residue Monitoring Plan adopted in India has also been discussed in detail. The establishment exporting the honey has to guarantee the implementation of all processes, including HACCP, GMP, and GHP. The establishment will also guarantee that traceability records will be adopted and that only the honey included in the scope of approval will be exported.

It is the primary responsibility of the industry to ensure that honey intended for export is processed and handled at all stages of production, storage, and transport under hygienic manufacturing conditions and that the product conforms to the specifications given in the order by the Central Government. The Executive Instructions also include a procedure for the inspection of each consignment. EIA personnel carry out inspections on consignments at either the port of shipment or at the premises of the establishment. Duplicate samples are drawn from each lot based on the procedure. A certificate of approval or rejection is issued to the establishment after laboratory testing as per the prescribed format.

In India, many establishments have emerged as recognised honey export houses. Kashmir Apiaries Exports, Ludhiana, Punjab, is one such corporate house, having 100 overseas buyers in more than 40 countries. Similarly, Kejriwals is another firm in Punjab which is fully equipped with all facilities and is successfully exporting honey. The market-related information of important honey exporting countries is included in this document.

Based on Indian strategies for promoting the export of honey, it is recommended that any country wanting to export honey should organise a network of concerned official and private agencies. The exporting country needs to define the honey route, which documents the geographical and botanical origin of the honey. It also has to update honey standards, which include sugar content, moisture content, hydroxyl methyl furfural content, diastase activity, electrical conductivity, acidity and so on, as laid out in the Codex Alimentarius, so that the honey produced meets international honey standards. The exporting country must also recognise the importance of traceability and should set up a plan for monitoring residues in honey, which is essential, otherwise importing countries may impose a ban on the final product if it contains residues of pesticides, lead, or antibiotics above permissible limits.

Acronyms and Abbreviations

APEDA	:	Agricultural and Processed Food Products Export Development Authority
BIS	:	Bureau of Indian Standards
CAC	:	Codex Alimentarius Commission
CFE	:	Certificate for Export
EIA	:	Export Inspection Agency
EIC	:	Export Inspection Council of India
FDA	:	Food and Drug Administration
GHP	:	Good Hygiene Practices
GMP	:	Good Manufacturing Practices
GVP	:	Good Veterinary Practices
HACCP	:	Hazard Analysis Critical Control Point
IDP	:	Inter Departmental Panel
IEC	:	Importer Exporter Code Number
MRL	:	Maximum Residue Levels
NABL	:	National Accreditation Board for Testing and Calibration Laboratories
NBB	:	National Bee Board
NCCP	:	National Codex Contact Point
NCR	:	Non Compliance Report
NRL	:	National Referral Laboratory
PCB	:	Pollution Control Board
RMP	:	Residue Monitoring Plan
USDA	:	United States Department of Agriculture
SSOP	:	Sanitary Standard Operating Processes
CCP	:	Critical Control Point
I&QC	:	Industry and Quality Control

Introduction

The honey business has undergone significant changes both in terms of supply and of demand, particularly in the past few years. Effective export marketing has become more important than ever, and the success of new as well as established exporters of honey depends to a great extent on the implementation of food safety systems such as Hazard Analysis Critical Control Point (HACCP), besides exporters' access to market information and on their marketing know-how. The aim of this study is to highlight the honey trade policy of India which has enabled the country to export large quantities of honey and to increase its foreign exchange earnings. This document gives details of the Executive Instructions from the Export Inspection Council of India (EIC), the Ministry of Commerce and Industry, the Government of India. It also provides information on international standards of honey for export, including traceability, and the monitoring of pesticide residues in honey. Information on successful Indian honey exporters and market requirements, product references, and so on, of leading importing countries is also included. The checklist for exporters and exporters to the EU has also been given in the annexes of this document. Sources of information are EIC, the Agricultural and Processed Food Products Export Development Authority (APEDA), the National Bee Board (NBB), and earlier studies on honey export.

Honey export from India

India has established itself as an important honey exporter to the world market. The country has been exporting honey since 1991-1992. The quantity exported used to be small, being a total of around 8,000 tonnes until 1998. It has increased substantially, reaching 15,587 tonnes in 2009. India exports honey to approximately 62 countries, with the majority being exported to Belgium, Germany, Saudi Arabia, the United Kingdom, and the United States.

Incentives for beekeeping in India

Since agriculture is the mainstay of the Indian economy, agriculture and other agro-based industries were developed by the government. However, the importance of beekeeping was largely neglected except for the efforts of the Khadi and Village Industries Commission (KVIC). Realising the importance of honeybees in improving crop productivity through their pollination services, the Indian Government took the initiative by setting up a National Beekeeping Board in 1994 to promote and develop beekeeping, to increase the number of bee colonies, as well as to increase training and the development of infrastructure for the overall growth of beekeeping.

APEDA offers various incentives and financial assistance to the exporters of agricultural food products, including honey. These schemes include feasibility studies and surveys, export promotion and market development, packaging development, assistance for promoting quality and quality control, and R&D. KVIC has different schemes for the promotion of beekeeping, including beekeeping training at various levels.

Strengths and weaknesses of the Indian beekeeping and honey industry

Strengths

India has a large acreage of bee flora, comparatively cheap labour, and a large domestic market for honey. In India there is a good number of beekeeping scientists working in different fields of apiculture research and development. Beekeeping research is organised under the All India Coordinated Project on Honeybees and Pollinators, whose centres are spread all over the country under different agroclimatic zones. These centres conduct research into different aspects of beekeeping, providing a strong impetus for the promotion of sustainable apiculture and helping to increase honey production, besides creating awareness of scientific beekeeping among beekeepers.

Weaknesses

India experiences seasonal variation in honey production. Transportation and packing material costs are very high. There is poor domestic awareness about the use of honey.

In spite of these weaknesses, there is a great potential for honey to be exported to the world market, which is evident from increasing honey exports during recent years.

Government strategy for promoting honey export from India

India has vast resources of untapped bee flora that can be exploited for honey production. Keeping in view the large bee forage area, the government has developed a strategy to increase the number of bee colonies in order to enhance honey production through exploiting these bee forage resources. Various schemes with regard to bee breeding, multiplication of colonies, bee diseases testing facilities, and other R&D facilities are being promoted. The government is also providing support for migratory bee keeping, training and development of bee keeping, and technical manuals. Beekeeping has also been identified as an integrated unit of the farming system and it is incorporated into various agricultural and horticultural development programmes in the country.

APEDA and the EIC are responsible for the overall development of beekeeping. They monitor all aspects of honey production and set up committees to allow India to achieve its potential for honey production and export. This is also done by making the EIC responsible for the introduction of quality control standards through all stages of honey collection, processing, testing, packaging, marketing, and ensuring that quality standards are as per EU monitoring standards. Financial incentives are also provided for the development of the honey export industry.

In India, the Department of Commerce under the Ministry of Commerce and Industry formulated the trade policy for food trade, import, and export. The EIC was set up by the Government of India under the Export (Quality Control and Inspection) Act, 1963, as an apex body to develop export trade through quality control and pre-shipment inspection. The Act empowers the Central Government to notify commodities and their minimum standards for exports (generally international standards or standards of the importing countries) and to set up suitable machinery for inspection and quality control.

The main function of the EIC is as follows:

- to advise the Central Government on measures for the enforcement of quality control and inspection of commodities intended for export; and
- to draw up programmes for quality control and inspection of commodities for exports.

The inspection and certification activities are carried out by the EIA, following either consignment-wise inspection or a systems approach to include in-process quality control (IPQC); or self-certification and food safety management systems-based certification (FSMSC). The EIA have well-equipped laboratories located at Kolkata, Kochi, and Chennai as well as one NRL at Jammu for honey testing. In addition, EIC has approved five private laboratories to test honey.

Methodology

Information pertaining to different parameters has been collected from various sources to achieve the objectives of the study. These include the following:

- information on international honey standards, EU and other developed countries' guidelines and standards for exporting honey;
- documented information on how India has adopted the policies, processes, standards, and guidelines of Codex Alimentarius and European Directive on Honey regarding honey quality to meet the requirements of the international honey trade; by providing examples of successful honey exporting companies sharing the factors or reasons for their successes as well as failures; and
- documents on monitoring requirements including residue monitoring plans (National Monitoring Plans for Residues in Honey, Beekeeping Census for Traceability, National Honey Sampling Policy, GMP Guidelines, and National Honey Trade Policy), certification, etc. and list of acceptable certification or accreditation agencies for exporting honey to developed countries

The information has been analysed and compiled to identify lessons and formulate recommendations that can be used by other countries of the region to export their honey to the international market.

- Various sources of information include:
- Agricultural and Processed Food Products Export Development Authority (APEDA),
- Ministry of Commerce & Industry, Government of India,
- Export Inspection Council of India,
- National Bee Board,
- Ministry of Agriculture and Cooperation, and
- Leading export houses engaged in honey export.

Standards for Honey Exports

As already discussed, all countries trading honey on the international market generally accept standards set by the Codex Alimentarius. Indian exporters also adopt Codex Alimentarius or as per the standard of the importing country. India has the Prevention of Food Adulteration Rules (PFA), 1955, which are the honey standards for domestic consumption of honey. A comparative account of the Indian standard and the Codex Alimentarius has been tabulated (Table 1). The definition of the honey harvested has been made according to its method of removal from the broodless comb. Honey must be extracted from broodless combs and should be allowed to ripen naturally in the hive in sealed combs. The definition and general characteristics of honey are set out below.

Definitions

- Honey is the natural sweet substance produced by honeybees from the nectar of blossoms or from the secretions of living parts of plants, which the bees collect, transform, combine with specific substances of their own, deposit, dehydrate naturally, and store and leave to mature and ripen in honeycombs. This foodstuff may be fluid, viscous, or crystallized.
- Extracted honey is honey obtained only by centrifuging decapped broodless combs.
- Pressed honey is honey obtained only by pressing broodless combs with or without the application of moderate heat.
- Drained honey is honey obtained only by draining decapped broodless combs.
- Blossom honey or nectar honey is honey which comes from the nectar of plants.
- Honeydew honey is honey which comes mainly from the excretions of plant sucking insects (Hemiptera) from the living parts of plants or secretions from the living parts of plants.

General characteristics

The honey must be extracted from broodless combs and should be allowed to ripen naturally in the hive in sealed combs. The flavour and aroma of the honey varies depending on its plant origin. However, it shall not:

- have any foreign taste or odour;
- have begun to ferment or effervesce;
- have been heated to such an extent that its natural enzymes are destroyed or made inactive;
- have an artificially changed acidity; or
- contain antibiotic residues, heavy metals, or other foreign substances in such quantity to endanger human health.

Table 1: Comparison of various standards of honey

Parameters	Specification					
	AGMARK (India)			PFA (India)	BIS (India)	Codex Alimentarius (international)
	Special	Grade A	Standard		3 Grades	
Moisture (% by mass)	20 (max)	22 (max)	25 (max)	Not more than 25	20, 22, 25	Not more than 20 (honey)
						Not more than 23 (heather honey)
Ash (% by mass)	0.5 (max)	0.5 (max)	0.5 (max)	Not more than 0.5	0.5	–
Total reducing sugar (% by mass)	65 (min)	65 (min)	65 (min)	Not less than 65.0	70,65,65	–
For Carbia colossa and honeydew				Not more than 60.0		
Sucrose (% by mass)	5 (max)	5 (max)	5 (max)	Not more than 5.0	5.0 in all	Not more than 5 g/ 100 g (honey)
For Carbia colossa and honeydew				Not more than 10.0		Not more than 10 g/100 g (other types of honey)
						Not more than 15 g/100 g (lavender, borage)
F/G ratio (% by mass)	1.0 (min)	0.95 (min)	0.95 (min)	Not less than 0.95	1.0 in all	Not less than 60 g/ 100 g (honey)
						Not less than 45 g/ 100 g (honeydew honey)
Acidity (% by mass) expressed as formic acid	0.2 (max)	0.2 (max)	0.2 (max)	Not more than 0.2	0.2 in all	Not more than 50 milliequivalents acid/ 1000g
Specific gravity at 27°C	1.40 (min)	1.35 (min)	1.35 (min)	Not less than 1.35	1.37 in all	–
Water insoluble solid (% by mass) (max)	Not prescribed			–	–	Not more than 0.1 g/100 g (honey)
						Not more than 0.5g/100 g (pressed honey)
Optical density	–	–	–	–	0.3 in all	–
Fiehe's test	Negative	Negative	Negative	Negative If Fiehe's test is positive and HMF content is more than 80 mg/kg, then F/G ratio should be 1.0 or more	If FT test is negative then honey is genuine if FT test is positive perform HMF content, if more than 80, then F/G ratio should be more 1.0	–
Aniline Chloride Test	Negative	Negative	Negative	–	–	–
	If both tests are positive, the sample shall be rejected for grading					
Diastase activity	–			–	–	Not less than 8 Schade units (honey after normal processing)
						Not less than 3 Schade units (honey with low natural enzyme content)
Hydroxy methyl furfural	–			Not more than 80 mg/ kg	80 in all max	40 mg/ kg (honey after normal processing)
						80 mg/ kg (honey from countries with tropical ambient temp.
Electrical conductivity	–					Not more than 0.8 mS/ cm (honey)
						Not less than 0.8 mS/ cm (honeydew and chestnut honey)

Codex Alimentarius and EU standards of honey

Codex Alimentarius standards: These standards apply to all honey produced by honeybees and cover all types of honey presentations which are processed and ultimately intended for direct consumption. Honey for direct consumption is either blossom honey or nectar honey which comes from the nectar of plants, or honeydew honey which comes from the excretions of plant sucking insects (Hemiptera) on the living parts of plants.

Codex standards clearly state that honey consists essentially of different sugars, predominantly fructose and glucose, as well as other substances such as organic acids, enzymes, and solid particles derived from honey collection. The colour of honey varies from nearly colourless to dark brown. The consistency can be fluid, viscous, or partly crystallised to entirely crystallised. The flavour and aroma may vary, and depend on the honey's plant origin. Further, the Codex standards also specify that honey sold as such must not have added to it any food ingredient, including food additives, nor must any other additions be made other than honey. Honey must not have any objectionable matter, flavour, aroma, or taint absorbed from foreign matter during its processing and storage. The honey must not have begun to ferment or effervesce. No pollen or constituent particular to honey may be removed, except where this is unavoidable in the removal of foreign inorganic or organic matter.

According to Codex standards, honey must not be heated or processed to such an extent that its essential composition is changed and/ or its quality is impaired. The use of chemical or biochemical treatments to influence honey crystallisation is also restricted.

The Codex Alimentarius standard of honey has laid down standards on moisture and sugars content. Moisture content in honey (except heather honey) should not be more than 20 %. Sucrose content, which is also an indication of adulteration, should not be more than 5 g per 100 g honey. This limit is 10 g per 100 g honey for alfalfa (Medicago sativa), Citrus sp., Robinia pseudoacacia, Eucalyptus camaduleusis, and Eucryphia lucida.

In the case of lavender and borage honey, the Codex limit for sucrose is 15 g per 100 g honey. The standard also has rules about contaminants such as heavy metals, pesticide residues, and veterinary drugs, since these pose a hazard to human health. These standards also contain provisions for hygiene; the labelling of honey designation according to the method of removal from the comb; and the method of sampling and analysis. In these standards additional composition and quality factors such as free acidity, diastase activity, hydroxy methyl furfural (HMF) content, and electrical conductivity are also defined. Diastase activity and HMF content are quality factors determined after processing and/ or blending. It is worth mentioning here that Codex has neither set nor proposed maximum residue limits for antibiotics in honey.

EU standards: The EU regulates honey under Council Directive 2001/110/EC. EU compositional requirements and standards for moisture content, sugar content, HMF, electrical conductivity, diastase activity, and physico-chemicals are same. The EU has adopted legislation on the use and monitoring of veterinary drugs. The EU has also listed substances safe to use in beekeeping. These substances include formic acid, phenol, fluvalinate, thymol and menthol, oxalic acid, and lactic acid. The EU has set a provisional MRL of 25 ppb for oxytetracycline in honey, 0.3 ppb for chloramphenicol, and 1.0 ppb for nitrofurans.

Honey Trade Policy of India

A trade policy is a collection of rules and regulations pertaining to trade. Every nation has some form of trade policy in place. The purpose of a trade policy is to help a nation's international trade run smoothly by setting clear standards and goals which can be understood by potential trading partners. In many regions, groups of nations work together to create mutually beneficial trade policies. Things like import and export taxes, tariffs, inspection regulation, and quotas can all be a part of a nation's trade policy.

In India, the Department of Commerce under the Ministry of Commerce and Industry formulated the trade policy for food trade, import, and export. The Export Inspection Council of India (EIC) was set up by the Government of India under the Export (Quality Control and Inspection) Act, 1963, as an apex body to provide for the development of export trade through quality control and pre-shipment inspection. The Act empowers the Central Government to notify commodities and their minimum standards for export, generally as per international standards or the standards of the importing countries, and to set up suitable machinery for inspection and quality control.

The main function of the EIC is as follows:

- to advise the Central Government on measures to be taken for the enforcement of quality control and inspection of commodities intended for export; and
- to draw up a programme for quality control and inspection of commodities for export.

Inspection and certification activities are carried out through the EIAs following either consignment-wise inspection or a systems approach to include in-process quality control (IPQC); self-certification and food safety management systems-based certification (FSMSC). The EIA have well-equipped laboratories located at Kolkata, Kochi, and Chennai as well as one NRL at Jammu for honey testing. Besides, these EIC has approved five private laboratories to test honey.

The main activities of the EIC are as follows.

- Export certification: To certify product to be exported: this is mandatory for some products, including honey.
- Residue monitoring: Residue monitoring has also been implemented in the honey sector.
- Certificate of origin: The EIC issues a Certificate of Origin document under various preferential tariff schemes, i.e., the Generalised System of Preferences (GSP); the Global System of Trade Preferences (GSTP); the SAARC Preferential Trading Arrangement (SAPTA); the South Asian Free Trade Area (SAFTA); the India-Afghanistan Preferential Trade Agreement (IAPTA); the Indo-Sri Lanka Free Trade Agreement (ISFTA); the Comprehensive Economic Cooperation Agreement (CECA)-Singapore; and the Early Harvest Scheme under the Indo-Thailand and Indo-Chile Preferential Trade Agreement (PTA).

In a changing global scenario, with India's trading partners introducing strict regulatory import controls, the EIC has also redefined its role to develop voluntary certification programmes besides regulatory export control, especially in the food sector. The Council is seeking recognition for its certification by the official import control agencies of its trading partners, as per the provisions of WTO agreements, to facilitate easier access to their markets for Indian exporters.

Accordingly, efforts have been made towards entering into Memoranda of Understanding (MoUs), Mutual Recognition Agreements (MRAs), or Equivalence Agreements with major trading partners so that the EIC's certification is accepted by these countries. In this regard, effective steps were taken towards negotiating agreements with Israel for food and agricultural items, while in 2004 an MOU/recognition agreement for EIC certification was signed with the Republic of Korea.

Executive instructions for quality control and inspection of honey

The Government of India, Department of Commerce, Ministry of Commerce and Industry, under the Export Inspection Council of India (EIC) Act, monitors the quality of products exported from India. After the signing of the WTO Agreement certain standards with regard to the quality and safety of food products had to be met for that product to be accepted for international trade. To ensure predefined quality and safety standards, there has been a shift in the approach of food regulators all over the world from final product testing to the process which controls these standards through safety systems such as ISO 9000, ISO 22000, and the Hazard Analysis Critical Control Point (HACCP) system. In the light of these developments, the EIC has laid down Executive Instructions for quality control and inspection of honey. The objectives of these instructions along with directions of the Government of India to meet these objectives are given below.

- Introduction of process control approach along with consignment-wise inspection of honey for approval of honey processing plants. The Government of India, Ministry of Commerce and Industry, issued order and notification No. SO.276 (E) and SO 271 (E), both dated 4 March 2002, to fix the primary responsibility of the industry.
- To ensure that honey intended for export is processed and handled at all stages of production, storage, and transportation as per the pre-defined practices such as good manufacturing practices (GMPs), and good hygienic practices (GHPs), the Government of India under Clause 6 of the Export (Quality Control and Inspection) Act 1963, has said that the industry must ensure that products conform to these specifications. EIAs have been designated as the competent authority to ensure compliance by exporters with requirements as per the Clause 3 read with Clause 4 of the Notification No. SO 297 (E) dated 4.03.2002.
- To facilitate the smooth functioning of the system by checking compliance with the requirements of the Government of India.

To meet the trading challenges, the Government of India has produced a detailed document in the form of Executive Instructions which is revised periodically. The main aim of this document is to keep a check on honey quality at all stages. This document has defined procedures for the approval of establishments intending to process honey for export, details of technical personnel, and renewal of the approval to open such establishments has also been fixed. These establishments are supposed to maintain GHP, GMP, and HACCP based on their own system of checks. Quality control parameters have also been defined. In addition, the Government of India has developed a plan to maintain traceability records along with a residue monitoring plan.

Monitoring by EIC or EIA officials is also a part of the Executive Instructions. Separate guidelines for dealing with unsatisfactory monitoring or other visit reports or violations, if any, has also been laid out here. Procedures for export certification, health certificate issuance, and dealing with returned consignments have also been set out. Annexes containing detailed information have been attached to this document, which are helpful for exporters as well as monitoring agencies in maintaining the final quality of produce.

Procedure for approval of establishment intending to process honey for export

'Establishment' here refers to any premises where honey is prepared, processed, packed, or stored. Thus any establishment intending to process honey for export must submit the application in the prescribed format as per Honey Annex -I to the office of Export Inspection Agencies under whose jurisdiction the establishment is situated. The establishment has to guarantee the implementation of all processes, including HACCP, GMP, and GHP. The establishment will also thereby guarantee that they will adopt traceability records and ensure that only the honey included in the scope of approval will be exported. It is worth mentioning here that honey processing, packaging, and storage cannot be started as such in any premises. The Government of India has detailed the requirements needed to approve an establishment for processing honey for export. GMP, GHP, and HACCP can only be effective if the establishment complies with all the requirements. These include details of the surroundings and construction layout; honey receiving points and workers' entry points; ceilings, walls and floors; specifications of doors, windows

and ventilation; drainage; furniture; cold storage; changing rooms and toilets; water to be used in the factory; the in-house laboratory; transportation; maintenance and so on. The aim of such stringent requirements is to adopt a proactive approach in maintaining the quality of the final product.

Application for approval

Application for approval is via the prescribed format (see Honey Annex-I) in duplicate along with documents of the EIA under whose jurisdiction the establishment is to be situated. The application submitted by the establishment must be accompanied by all relevant records, including the HACCP Manual (including the SSOP, process flow chart (s) with product description, manufacturing details in each step, Self-RMP). In the case of establishments producing honey for export to the EU, reports on the water used during processing activities needs to be included. An attested or certified copy of the test report from the EIA Lab or EIC-approved lab in respect of water compliance with EC directive No. 98/ 83/ EC dated 3.11.1998 needs to be enclosed with the application. However, in the case of establishments meant for export to countries other than the EU, the water needs to be tested as per IS: 4251, from the EIA Lab or an EIC-approved laboratory. Location and the layout plan of the establishment (site plan and building plan on A4 size paper), showing all infrastructure and equipment facilities and layout showing the process or product flow, personnel flow, water flow, and effluent flow must also be enclosed with the application.

A list of identified regional or district beekeeping farms from which the establishment intends to procure raw honey for processing along with details like the address, and distance from the processing establishment are also needed.

The biodata of the veterinarian(s), technologist(s), or chemists, and an appointment letter or certificate of employment from the establishment are needed. In addition, a certificate of approval of Export Inspection along with an undertaking and guarantee in the formats as per Honey Annex -IA and Honey Annex -IB are also mandatory and need to be submitted by each unit.

An attested or certified copy of a letter of consent issued by the Pollution Control Board concerned and an attested or certified copy of the order allotting the Importer Exporter Code number must also be submitted with the application. Hence, the establishment is supposed to complete all requirements at the time of applying for approval of honey export.

It is the primary responsibility of the industry to ensure that honey intended for export is processed and handled at all stages of production, storage, and transport under proper hygienic and manufacturing conditions and that the product confirms to the specifications given in the order by the Central Government. Furthermore, establishments must adhere to any statutory restrictions which are imported by the Central or State Government with respect to commercial, environmental, or conservation measures. It is only after the complete satisfaction of the competent authority (the EIA) that approval is accorded to establish a premises where honey will be processed for export. The competent authority may take the assistance of representatives from the APEDA, the Department of Food Processing Industry, and the Ministry of Agriculture in the matter. The approval of an establishment for honey export is a highly technical and elaborate step and is the basis of success for honey export.

Processing applications for approval

Applications received will be scrutinised by the EIA office where they have been received and the discrepancies or shortcomings observed are communicated to the applicants for rectification. A copy of the application along with the relevant documents and comments of the Officer In-Charge of the Sub-Office, or the Officer In-Charge of Food Scheme (as applicable) is forwarded to the In-charge of the Agency within seven working days after receiving it complete in all respects. The adequacy audit of the Hazard Analysis Critical Control Point Manual and the Sanitary Standard Operating Procedures are carried out by an EIA officer who has adequate knowledge of HACCP authorised by the In-Charge of the Agency. The adequacy audit report as per Honey Annex -IIA along with the Audit Observation sheet in Honey Annex -IIB and the document is forwarded to the In-charge of the Agency within five

working days. The audit document is to adjudge the suitability of the infrastructure and equipment facilities of the establishment for the processing, handling, and storage of honey and the HACCP-based food safety management system.

Assessment of the establishment

The Inter Departmental Panel assesses the infrastructure and equipment facilities of the unit as well as the records of the beekeeping farms and reports its observations using the Assessment Report Format shown in Honey Annex -IIIA. Such assessment is meant for on-site verification to adjudge the suitability of the infrastructure and equipment facilities of the establishment for the processing, handling, and storage of honey and the HACCP-based food safety management system. The requirements for the approval of the establishment to process honey meant for export are provided in Honey Annex -IC.

If the Inter Departmental Panel finds any deficiency during its assessment, the same is recorded in the non-conformity report which is countersigned by the representative of the establishment as a token of acceptance as per Honey Annex - IV. The copy of the NCR may be handed over to the establishment along with any observations for improvement. Additional suggestions for improvement, if any, are given to the processor separately, the implementation of which is not a part of the approval procedure.

After assessment, the recommendations of the Panel clearly state whether the applicant's establishment is recommended for approval or conditional approval or not. Conditional approval is granted by the In-charge of the Agency for a period of three months from the date of approval, which may be extended to a maximum period of six months. The conditional approval is intimated to the establishment as per the format given in Honey Annex -VI.

In case the Inter Departmental Panel does not recommend approval, and if agreed to, the In-charge of the EIA shall convey the same to the applicant, within seven working days of the receipt of the Inter Departmental Panel report, along with the reasons for which the application for the establishment has not been considered fit for full or conditional approval in the prescribed format (Honey Annex -V).

The Inter Departmental Panel assesses the unit for compliance with the requirements of GHP, GMP, and HACCP by an on-site visit and submits its report to the In-charge of the Agency in the prescribed format placed in Honey Annex - IIIB. Honey Annex -IIIB comprises the assessment report for GMP, GHP, GAP, HACCP, etc. which otherwise uses on-site verification to assess the implementation of the HACCP-based food safety management system for processing, handling, and storage of honey. This is of the utmost importance as any failure in such management is likely to result in the rejection of the export consignment at the domestic or international level. This assessment is meant for checking personnel information about the establishment. The assessment on record keeping of raw honey production will help in traceability. General hygiene requirements (during transport, personnel hygiene, storage conditions, heat treatment, etc.) allow the establishment to meet the health requirements of the international market. Assessment of the capabilities of the establishment in terms of the in-house lab or veterinary technologist, and food chain information with respect to the use of veterinary drugs is aimed at checking for residues in the final product.

All these checks are important in the context of today's export scenario, where the EU has imposed a ban on honey from India after laboratory tests reportedly showed a high level of lead and antibiotics in the samples (The Hindu, Sept. 18, 2010). Such a situation can only be avoided if effective steps are taken during production, processing, storage and transportation of honey. The deficiencies observed, if any, in the HACCP implementation, GMP (Goods Manufacturing Practice), etc. are recorded in the report as per Honey Annex -IV.

On satisfactory completion of the assessment of GHP, GMP, and HACCP, the Inter Departmental Panel recommends approval and submits a report to the In-charge of the Agency within three working days after the completion of the assessment.

If satisfied, the In-charge of the Agency grants approval to the establishment for a period of one year from the date of the conditional approval, which is intimated to the unit as per the format specified in Honey Annex -VII with a

copy marked to the Export Inspection Council. The certificate of approval is issued by the Export Inspection Council as per the format specified in Honey Annex -VIII.

Once the In-Charge of the Agency grants the approval to the establishment, the existing list of the establishment(s) is included in the list of establishments by the Export Inspection Council and a copy of the updated list along with the specific recommendation for approval shall be submitted to the Mission of India in Brussels for submission to the EC, with copies to the Customs and the EIA concerned.

Approval of veterinarian, technologist, or chemist

The establishment's veterinarian also must be approved via assessment. The veterinarian should supervise honey processing operations. He or she should have knowledge of sampling techniques, his or her own HACCP-based checks system, knowledge of the Executive Instructions, knowledge of the regulatory requirements of importing countries, etc. This will make the establishment's own check system foolproof.

The Inter Departmental Panel (IDP) is also entrusted with granting approval of the veterinarian(s), technologist(s) or chemists after satisfactory assessment. For this purpose, an individual desiring approval as a veterinarian, technologist or chemist submits an application in duplicate, as per the format given in Honey Annex -IX, along with the prescribed fee, to the controlling office of the EIA. The Head Office of the EIA arranges assessment of the veterinarian(s), technologist(s) or chemist(s) by the Inter Departmental Panel, who submits the report as per the format given in Honey Annex -IXA. On approval of veterinarian(s), technologist (s), or chemist(s), a certificate of approval is issued as per the prescribed format (found in Honey Annex -IXB) by the EIA concerned.

Procedure for approval of additional facilities or activities of an approved establishment

The regulatory requirements of importing countries and the statutory requirements of the domestic country or otherwise means that establishments may require approval for additional facilities or processing activities for new products. Under such circumstances, approval for additional facilities or activities for approved establishments is given after assessment as per Honey Annex -X.

Approved establishments seeking approval for additional facilities or activities must submit their application in the prescribed format (Honey Annex -X) in duplicate, along with the relevant documents as mentioned in the application form, to the controlling local office of the EIA, including the application fee. Observations are reported in the prescribed Assessment Report Format as per Honey Annex -XA. If any major or serious deficiencies are observed during assessment, these are brought to the notice of the establishment through the NCR (Honey Annex -IV) so that corrective action can be taken within an agreed time period.

Procedure for approval of establishments

It is important that renewal of approval of establishments is granted only after thorough assessment of existing facilities or creation of additional facilities. Thus, the approved establishment submits an application for renewal along with information on layout changes, the approved number of veterinarians, annual production, export, and additional facilities or equipment provided during the last year.

The approved establishment seeking a renewal of approval shall submit application(s), in duplicate, at least sixty days in advance of the expiry of the previous approval to the controlling local office of the EIA in the form prescribed in Honey Annex -XI, along with other relevant documents and the application fee. The EIA may also remind the processor (as per Honey Annex -XII) seventy-five days before the expiry of the approval.

In case the establishment does not apply for renewal in time and if the renewal of approval is not completed within the validity period due to the delay on the part of the processor and the approval granted to the unit lapses, the

establishment will need to apply for fresh approval. However, for assessment for renewal, the Inter Departmental Panel prepares its Assessment Report as per Honey Annex -XIII. In case the Inter Departmental Panel finds any deficiency during assessment, these are listed in the NCR (Non Compliance Report), found in Honey Annex -IV, a copy of which is also given to the establishment in order that it might take corrective action within an agreed time period.

If the Inter Departmental Panel does not recommend renewal of approval, the In-charge of the EIA concerned withdraws the approval granted to the establishment within three working days of the receipt of the Inter Departmental Panel report, with due intimation to the Export Inspection Council to inform the EU, where applicable.

However, in case the Inter Departmental Panel recommends renewal of approval and the In-charge of the Sub-office submits a satisfactory performance report (as per Honey Annex -XIV) the In-charge of the EIA grants renewal of the approval for a period of one year from the date of expiry of the earlier approval and informs the establishment accordingly, with a copy marked to the Export Inspection Council.

A certificate of approval is issued by the Export Inspection Council as per the prescribed format (Honey Annex -VIII) and is sent to the processing unit through the EIA concerned. The certificate, under normal circumstances, remains valid for a period of one year from date of expiry of the previous approval.

Permission to process and pack honey for export by a merchant exporter

The merchant exporter is person engaged in trading and exporting products. An approved establishment can make a request that a merchant exporter process and pack honey for export. However, such an establishment has to give an undertaking to comply with the EIC or EIA directions and give assurance that honey meant for export by the merchant exporters will only be processed in the approved establishment. The establishment is also responsible and liable for any act of omission or commission by the merchant exporters in respect of any quality issue or any trade related issue, including cheating.

Establishments intending to process and pack honey on behalf of merchant exporter(s) submit their application to the EIA concerned as per the format given in Honey Annex -XV along with a fee. Approval for processing handling honey meant for export by the merchant exporter(s) is given by the EIA concerned as per the format given in Honey Annex -XVA. When an approved processor requests the EIA to cancel the permission given to process and pack honey for any merchant exporter, the permission is withdrawn using the format given in Honey Annex -XVB.

Change in company name

In case there is a change in the name of the company, the establishment furnishes the required documents (attested or certified legal documents relating to the change or any other relevant document) to the controlling local office of the EIA under whose jurisdiction the establishment is situated.

Responsibilities of the approved establishment

As the sole responsibility in maintaining the quality and safety of the products processed in the establishment lies with the approved establishment, the establishment is required to maintain GHP, GMP, and HACCP based own its check system. The establishment needs to exercise proper controls at all stages of production, starting from raw material procurement (including honey production control) to the final dispatch of the cargo, and maintain records thereof. The establishment has to comply with all the regulatory requirements of the GOI (Government of India) Order and Notification S.O. 276 (E) dated 4 March 2002 and S.O.1441 (E) dated 19 December 2003, as well as those specified by the importing country and by the Export Inspection Council. Establishments must maintain all the approved infrastructure and equipment facilities of the unit in good repair. For major alterations or changes in the infrastructure and equipment facilities, prior approval from a competent authority is necessary.

- All the controls and sampling procedures should be in line with GHP, GMP, and HACCP. Proper control of CCPs must be ensured, and any deviation in the process flow, or changes made in the HACCP Manual has to brought to the notice of the EIA concerned immediately.
- Implementation of the HACCP is monitored at all stages so as to ensure the quality and safety of the product. Time and temperature controls are also exercised at all stages of processing, storage, and transportation of the material.
- Traceability of honey, levels of permitted chemicals, etc. are maintained right from the source of production. The processor shall maintain test reports pertaining to the quality and safety of the raw material. Establishments validate the processing method used for melting honey and calibrate all the recording devices at a frequency appropriate for proper temperature control.
- A cleaning and disinfection programme is to be implemented to ensure that all parts of the establishment are appropriately cleaned, including tables, utensils, and equipment. The programme should be continuously and effectively monitored for its suitability and effectiveness and whenever necessary, documented. The personal hygiene and behaviour of the employees shall be strictly monitored to ensure the safety of products handled. Health cards shall be maintained for all workers handling food products.

It is also the prime duty of an establishment to ensure that the honey of other establishments is not stored in the approved premises of the establishment without prior permission from the EIA concerned and that the establishment procures honey only from identified beekeeping farms

Quality control

The processor must also establish proper quality control measures and a sampling plan. These must be documented and implemented to ensure the wholesomeness of the products processed. The establishment shall exercise proper controls over the identified beekeeping farms/ collection centres/ honey production holdings from where honey is being procured. The establishment must conduct periodic audits to verify that the requirements are being met in terms of food safety, bee parasites, water, etc. as per Honey Annex -XXVIIC. The verification may also include testing of samples drawn from the farms, wherever applicable. The establishment has to maintain traceability records for raw material procurement along with checks for physiochemical characteristics.

Furthermore, an approved establishment must ensure that the identified beekeeping farms (from where the honey is being procured) are tested for prohibited pharmacological substances, environmental contaminants, etc. as per Honey Annex -ID.

EU-approved establishments must test water used in the factory for all parameters as per EC Directive No.98/83/ EC at least once a year, or whenever the source of water is changed. Water is also tested for parameters [Table A (1) of EC Directive No.98/ 83/ EC] as mentioned in Honey Annex -XVI once a year. However, establishments approved for export to countries other than the EU must test water used in the factory as per IS 4251 on a yearly basis, except for radiological parameters.

Records

Proper records are to be maintained by the processor at all stages of production, storage, and transportation of honey, including for the primary production of honey (at beekeeping farms/ collection centres/ honey production holdings) and should be made available to the EIA / Export Inspection Council officials for verification. The processor has to maintain traceability records pertaining to the raw honey, other food ingredients, chemicals, packing material, processing, final produce and so on.

Marking of approval number on export packages

Identification marks and details of the approved establishment are applied before the product leaves the establishment. Such identification must be applied to a product unless its packing and/ or wrapping is removed or

it is further processed in another establishment in which case the new mark must indicate the approval number of the establishment where these operations take place. The mark may be applied to the wrapping or the packaging, or printed on a label affixed to the package. The approval number along with the specified 'Q Mark' as given below, must be printed on/ attached to a label and affixed to all the packages of honey intended for export. The marks must be legible and indelible, and the characters easily decipherable, and must be clearly displayed for the competent authorities. In addition to the general requirements for identification marking, consignments of honey that are destined not for retail, but for for use as an ingredient in the manufacture of another product must have a label giving the temperature at which the honey must be maintained and the period during which conservation may thus be assured.

However, export of honey without printing a 'Q Mark' on the master cartons will be allowed in cases where there is a specific request to that effect from the foreign buyer. In such cases, the exporter must receive prior permission from the EIA concerned after submitting the relevant document(s). Even in such cases, the approval number of the processing establishment must be legibly printed/ on the cartons or on a label affixed to the cartons.

Note: 'Export package' means the final package produced before the Customs in India and which is received and checked Customs at the importing end.

Official control by the competent authority

The Government of India has issued instructions for exhaustive monitoring of the processed product in approved establishment(s). The monitoring officer records observations on the maintenance of infrastructure facilities and the sanitary/ hygienic conditions of all the facilities in the establishment (Honey Annex -XVII). The officer also takes account of the HACCP implementation plan, and observation of its execution in the unit is recorded with regard to testing and lab practices in the house laboratory along with verification of records (raw materials, production, heat treatment, tests, water testing records an so on). Observations on all these aspects along with suggestions, if any will be recorded. He also verifies traceability by product tracing from end product to raw material to beekeepers during his visit to the establishment.

Strict confidentiality has to be maintained in all the official control visits and the establishments are not given prior information about the visit. The visits shall be conducted unforeseen and unexpected. For proper official control, a three-tier surveillance system is developed and followed as per the details given below.

Monitoring by export inspection agency officials

The EIA officials shall carry out periodic monitoring of the honey processing establishments to ensure that:

- all the approved facilities are being maintained by the establishment as per the requirements,
- all the regulatory requirements and those specified by the importing countries are being complied with, and
- the products processed in the establishment conform to specifications.

The responsibility for periodical reviews of the performance of units and submission of recommendations to the In-charge of the EIA is that of the controlling field office/ sub office of the EIA. The proforma placed in Honey Annex -XVIID is used for this purpose. Changing the frequency of the monitoring is done by the In-charge of the Agency. Each EIA has to maintain office-wise records showing the establishment's name, approval number, and frequency of monitoring.

Areas of monitoring

Monitoring is vital in maintaining the quality of products and for the verification of the various activities of any unit. Monitoring mainly focuses on the following.

- Facility checks: to ensure that all the approved facilities are being maintained by the unit. This also includes verification of sanitary and hygienic conditions prevalent in all sections of the unit.
- Verification of traceability: records for raw material procurement and processing, and final produce. This includes the verification of records maintained by the unit to ensure that raw honey is procured only from identified beekeeping farms/ collection centres/ honey production holdings, the list of which has already been submitted by the unit. The monitoring official must verify, through documentary evidence, hygiene conditions; bee diseases/ parasites; use of veterinary medicinal products , if any; good veterinary practices (GVP)/ good farming practices; controls exercised by the unit over bee production holding; and processing; and final packaging of honey for dispatch in the market.
- Verification of compliance with the GHP and HACCP to ensure that the unit has complied with the HACCP as envisaged in their HACCP manual and that controls exercised by the unit are adequate and effective. This includes verification of CCP monitoring; GMP; GHP; Sanitary Standard Operating Procedures; traceability, good storage practices, raw material/ process/ product controls, time/ temperature controls, quality management of water, calibration and validation, etc.
- Verification of testing and lab practices to ensure that the sampling procedures and test methods adopted by the establishment are adequate and reliable. This includes good lab practices followed by the unit's in-house lab, effectiveness of lab chemicals, reliability of testing, etc.
- Verification of records to ensure that the records maintained by the unit are in order and cover all the controls exercised by the unit.
- Fraud control to ensure that the unit is not violating norms. This includes violations with respect to export of honey processed in unauthorised places, storage of honey from other establishments without prior permission, misuse of CFE, improper labelling, exceeding capacity limits, etc.
- Withdrawal of official samples to ensure the wholesomeness of the products and effectiveness of cleaning and sanitation. This includes sanitary samples, samples for testing microbial parameters, organoleptic checks, etc. as well as residual parameters, whenever required.
- The monitoring officials shall also check and record the chlorination levels of water used for disinfecting feet, hands, and washing utensils/ equipment, etc., wherever applicable. They should be thoroughly rinsed with potable plain water after disinfecting.
- Monitoring officials also conduct various quality checks on the available raw honey procured by the unit/ establishment from identified beekeeping farms/ collection centres/ honey production holdings for its freshness and wholesomeness.
- Microbiological/ chemical checks are also done by the monitoring official.

Reporting system

After completing the monitoring, the report is prepared in the Monitoring Report Pro-forma (Honey Annex -XVII). The report is submitted to the controlling office of the EIA within three working days of the visit along with Non Conformity Report (NCR) as per Honey Annex -XVIIA and Suggestions for Improvement (Honey Annex -XVIIB), if any.

Similarly, the report for the beekeeping farm/ collection centres/ honey production holding shall be enclosed in the Farm Visit Report Pro-forma (Honey Annex -XVIIC).

The Sub-office sends a copy of the Monitoring Report, test report, NCR and Suggestion Report to the HO on a monthly basis for all the establishments. If the samples fail, the processor will be told. Test reports can also be given to the processor if specific requests have been made for the same.

A Non Conformity Report and Suggestion Report are submitted as per Honey Annex -XVIIA and Honey Annex -XVIIB, respectively.

Supervisory visits

Supervisory visits are carried out by an officer of the level of deputy director and above from the agency concerned, having adequate experience in the operation of food schemes. The frequency of supervisory visits shall be once in six months. The supervisory visit must be conducted to check the documentation and compliance of the requirements of the EC Directives in the case of EU-approved units, and GOI Notifications as per H-XVIII.

Corporate audit

An audit of each agency is carried out at least once a year. The main objective of the corporate audit is to ensure the uniform implementation of the rules and regulations issued by the Competent Authority and are submitted to Director (I&QC) as per format specified in Honey Annex -XIX.

Dealing with unsatisfactory monitoring or other visit and/ or test reports and violations

Deficiencies which do not affect the wholesomeness (food safety) of the products, are considered to be minor deficiencies and those which affect the safety of the food product are considered to be major deficiencies.

However, contamination with hazardous substances like heavy metals, antibiotics, pesticide residues, etc. above permissible limits will be considered a major deficiency.

Action to taken in case of failure of samples drawn for monitoring the residues under RMP

When the samples drawn for the Residue Monitoring Plan (RMP) fail to meet the requirements, the EIA shall take the appropriate action as specified in the RMP.

Reporting to the EIC

The Government of India has established a three-tier system for reporting, which is carried out on a monthly basis. Each sub-office sends monthly reports to the head office of the concerned agency. Details of planned monitoring and supervisory visits along with the number of units found to be satisfactory\ unsatisfactory, with reasons (Annexes XXIII) are submitted. Action taken in case of the unit being found unsatisfactory, well as details of verification of corrective action taken by the processing units reported unsatisfactory in the earlier statement, are also part of this report.

Thus, the country wanting to export honey is also required to develop a foolproof system of regular monitoring. Any change in the list of approved honey establishments separately for EU and non-EU is also submitted as per Honey Annex -XXIV. During the month under report, the sub-office also reports details of samples that failed during the monitoring of the EU's approved honey units (Honey Annex -XXV). In case of complaint from the importing country against any honey establishment, a status report is submitted (Honey Annex -XXVI). This report goes into detail with regard to the complaints, the current station, and the location of the consignment in question as per the information given to the EIC.

In case the consignment is brought back, then the details of the test results are also enclosed with the report. Further, an assessment report of the establishment concerning the implementation of HACCP, routine testing by the unit, traceability and source of raw materials, and the test results of the samples drawn during assessment, as well as the current status of sanitation/ hygiene and details of the consignment inspection tested and its present status are also prepared as per Honey Annex -XXVI.

Procedure for consignment-wise inspection

Executive Instructions for the inspection of each consignment have been laid down. The EIA personnel concerned carry out consignment-wise inspections either at the port of shipment or at the premises. Duplicate samples are drawn from each lot based on the procedure given in Honey Annex -XXVIII. A certificate of approval/ rejection is issued to the establishment after laboratory testing as per the prescribed format that the details of these procedures is given under.

Application for inspection

The exporter seeking approval is required to submit their application for inspection in the prescribed format given in Honey Annex -XXVII in triplicate to the concerned EIA in their region. The application is accompanied by a copy of the technical specification and by the export contract with pricing and other details.

Inspection

The inspection is carried out by the concerned EIA either at the port of shipment or at the premises of the packer or any other premises which may be registered with any regulatory authority, where the consignment is offered by the exporter subject to adequate facilities for the inspection (including drawing, preparation and sealing of the samples being provided by the exporter).

In addition to this, the agency has the right to reassess the quality of the consignment at any place of storage, in transit, or at the port before the actual shipment.

Sampling

For the purpose of testing the consignment with reference to the standard specifications laid down in the Notification, samples in duplicate are drawn from each lot offered for inspection by the designated EIA official based on the sampling procedure given in Honey Annex -XXVIII.

One sample is given to the exporter, while the second sample is sent to the EIA laboratory for testing as per the specifications prescribed. The exporter's sample will be analysed only in case of dispute.

Testing

The lab sample is brought by the EIA official and handed over to the EIA lab/ Export Inspection Council-approved lab, or is sent by courier with due acknowledgement in case the inspection is carried out by the EIA sub-office, but in no case can it be left with the exporter.

Lab samples are tested for all parameters prescribed in the schedule of notification/ contractual/ international specification as per the method of analysis referred in the Codex Alimentarius Commission/ AOAC.

The test report of the lab sample is furnished as per the prescribed format given in Honey Annex -XXXI within seven days of sampling.

Certificate of inspection

If the sample conforms to the prescribed specifications, the EIA shall issue a certificate of inspection as per the format prescribed in Honey Annex -XXIX. The certificate of inspection will be valid for a period of one month from the date the test report was issued.

If the sample drawn does not conform to the prescribed specification, the consignment will be rejected for export and the rejection report is issued as per the prescribed format given in Honey Annex -XXX.

Export certification

Certificate for export (CFE)

Since all the consignments of honey meant for export should undergo quality control and inspection prior to shipment and should be accompanied by a Certificate for Export (CFE) as per the format given in Honey Annex -XXI, the approved processing units issue a Certificate for Export (validity being forty-five days from the date of issue) for every export consignment.

Books of CFE blanks are issued on request from the approved processing establishment only after the approval of the DD In-charge of the scheme/ officer in-charge and after the previous CFEs issued have been accounted for and paid for. In case of lost certificates, the exporter submits an indemnity bond to that effect to the EIA concerned as per the format given in Honey Annex -XXII. The EIA, in turn, informs the Customs to check that those numbers have not been presented to them, so that Customs do not accept those specific certificates in future. Every approved establishment also submits a periodic statement of Certificate for Export issued, enclosing the pink copy of the CFE on a fortnightly basis for the export of honey along with honey imported from other countries, in the pro forma given in Honey Annex -XXIA.

Health certificate issuance

All consignments of Indian honey exported to the EU are required to be accompanied by a numbered original Health Certificate, in accordance with the model Honey Annex -XXA duly completed, signed, and dated. The model Health Certificate meant for non-EU approved establishments can be found in Honey Annex -XXB. The Health Certificate should be issued before or on the day of shipment and cannot be issued retrospectively. The processor/ exporter can request a Health Certificate from the controlling office of the EIA by submitting an application in the prescribed format as per Honey Annex -XXD.

Fee structure

The prescribed fee must be paid in the form of a demand draft/bankers cheque in favour of the EIA concerned, or through the deposit account held at the EIA concerned, as applicable.

Procedure to be followed for complaints received from importing countries

General

Immediate action is taken to deal with the rejected consignment when a complaint is received from the importing country, or a consignment of honey is detained. Such action is also taken when specific control measures are imposed by the importing countries on food safety grounds such as product contamination with residues (antibiotics, pesticides), or there is any other complaint due to a failure in quality parameters or in areas such as labelling and packaging.

If the cargo is rejected by the overseas health authorities of any importing country, the exporter informs the concerned EIA immediately, sending a copy to the Export Inspection Council of India (in case of a Merchant Exporter, a copy of the communication is also sent to the manufacturer/ processor). If a complaint is received at the Export Inspection Council it is immediately referred to the EIA concerned. The Export Inspection Council may simultaneously seek complete details from the complainant. If the complaint concerns food safety, the processing unit is immediately placed 'on alert' by the appropriate EIA. The frequency of monitoring visits is then increased to two visits per month.

If the situation is due to in-process contamination, ten consecutive consignments are subjected to consignment-wise testing for the specific contaminant. Such contaminants may be permitted pharmacological substances; other permitted substances (such as phosphates) above the permissible level; environmental contaminants such as PCBs, dioxins, pesticides; or the use of prohibited pharmacological substances (chloramphenicol, nitrofurans, etc.);Samples are drawn from all the batches of the consignment to make a composite sample. If the rejection is due to quality parameters, the next ten consignments are inspected for organoleptic and chemical factors. The inspected consignments can be exported to EU or non-EU countries only after satisfactory test results from the EIA laboratory or Export Inspection Council-approved laboratory for the specific parameter(s). However, if the consignment fails in any of the parameters tested, the consignment may be re-tested batch-wise on the request of the exporter/ manufacturer and only those batches, conforming to the specific parameter(s), are allowed to be exported.

The EIA seeks complete and detailed information about the consignment in question from the processor. Based on the assessment, the team prepares a detailed report and submits this to the Head Office of the EIA and the appropriate action is taken.

Dealing with returned consignments

If the consignment has been returned to India, the processor must inform the EIA concerned about the consignment and where it is stored. The agency must in turn inform the Export Inspection Council.

After receiving this information, the local office of the EIA arranges for the consignment to be inspected/ tested as appropriate. One composite sample each from every production batch is tested for the specific contaminant at two different laboratories. Testing has to be done at the EIA laboratory or the Export Inspection Council-approved laboratory. The results are communicated to the Agency Head Office. If all the samples tested from the returned consignment show negative results for the specific contaminant(s), the In-charge of the EIA concerned may take the decision to release the consignment for export to the country other than the country/ union of countries where the consignment had been rejected. However, if any of the samples tested from the consignment returned on account of a food safety complaint shows positive results, the processor must dispose of (reprocess or destroy) the consignment in a manner acceptable to the In-charge of the EIA concerned.

The processor shall offer the reprocessed consignment for inspection by the EIA, who then inspects the reprocessed products batch-wise for all parameters as per the sampling plan, and if the reprocessed products are found to be export-worthy on inspection, the lots/ batches are allowed for export to countries other than the country or union of countries where they had been detained prior to reprocessing.

If a consignment is brought back because of a complaint, and if when tested for contaminants it is found to be free of contamination or defects as evidenced by test or organoleptic reports, and if the assessment report indicates that the processing establishment has been maintaining proper hygienic conditions and implementing HACCP, and if the periodical monitoring conducted by the EIA during the past three months also indicates satisfactory hygienic conditions in the unit, then the EIA shall put forward a case with the relevant papers or reports to the Director (I&QC) with a recommendation that the matter be taken up with the foreign health authority to revoke their specific control measures or rapid alert, as the case may be. The Export Inspection Council may make the necessary recommendations to the foreign health authority through half-yearly dossiers. The EIA concerned shall reduce the number of monitoring visits to once a month, provided at least four fortnightly monitoring visits have been carried out since the 'On Alert' was imposed. However, the 'On Alert' imposed on the unit shall be revoked only after the approval of the Director, Industry and Quality Control (I&QC).

However, if any of the above points are unsatisfactory, i.e., the consignment, if brought back, is on testing found to be contaminated / defective or the assessment report indicates unsatisfactory hygienic conditions in the unit, or samples drawn during assessment visit fail, production and export to all countries shall be stopped until the cause(s) of contamination are properly identified and the appropriate corrective actions are taken to prevent

recurrence. Under such circumstances, once the processor informs the EIA that corrective actions have been carried out, verification of the corrective actions shall be carried out by the EIA. The processor may be allowed to resume production for export only after satisfactory on-site verification of the rectifications of the deficiencies and approval of the Director (I&QC). After resumption of production, an officer, not below the rank of Technical Officer, is deputed to the unit for a minimum of ten days, extendable up to thirty days, in order to monitor continuously the enforcement of standards relating to quality control, food hygiene, and food safety. The consignment-wise inspection is carried out until ten consecutive consignments are cleared satisfactorily. The unit will only be taken off the 'On Alert' list after proper monitoring, and when the testing of the consignments is found to be satisfactory.

Appeal

Any person aggrieved by the decision of the Competent Authority not to issue a certificate of inspection to the establishments as per Rule 7, Notification No. S.O. 277 (E) dated 04.03.2002, may prefer an appeal within ten days of the receipt of such a communication to an appellate authority appointed periodically by the Central Government, which will be considered by a panel of experts.

Power to relax

If a situation arises which is not covered by the Executive Instructions, Export Inspection Agencies may make a suitable recommendation to the Export Inspection Council for a decision by the Director (I&QC).

Traceability

'Traceability' or 'product tracing' is defined by the Codex Alimentarius Commission as "the ability to follow the movement of a food through specified stage(s) of production, processing and distribution". The International Standards Organization (ISO 84022) defines 'traceability' as the "ability to trace the history, application or location of an entity by means of recorded identifications".

The EU General Food Law (Regulation [EC] No. 178/2002, Article 18, paragraph 1) offers a definition of traceability with particular regard to food and feed sectors: 'Traceability' means the ability to trace and follow a food, feed, food-producing animals, or a substance intended to be, or expected to be, incorporated into a food or feed, through all stages of production, processing and distribution." In general, traceability measures can be used to:

- improve the management of risks related to food safety and animal health issues;
- guarantee products' authenticity and to give reliable information to customers;
- improve products' quality and processes.

With regard to international trade, new legal requirements in mainly developed countries relating to traceability have recently been implemented; and in various sectors importing countries have placed increasing pressure on exporting countries to comply with traceability requirements. These measures, however, must comply with the World Trade Organization agreements; they must be justified as having a sanitary or phytosanitary (SPS) objective, or as having another legitimate objective.

Traceability in India

'Traceability' of honey, permitted chemicals and so on is maintained right from the source of production in India. The processor must maintain test reports pertaining to the quality and safety of the raw material. Proper records must be maintained by the processor at all stages of production, storage, and transportation of honey, including primary production of honey (at bee keeping farms/ collection centres/ honey production holdings) and must be made available to the EIA/ EIC officials for verification. The processor has to maintain the following basic records:

- raw material receiving and evaluation records;
- temperature records of storage tanks/ melting stage/ moisture reducing stage/
- pasteurisation;
- quality control records;
- consolidated daily production records;
- packing records;
- microbiological / chemical test reports, physiochemical characteristics pertaining to honey, water, sanitary samples, and so on;
- packing/ packaging material records;
- HCCP monitoring records;
- corrective action and verification records;
- cleaning and sanitation records;
- pest control records;
- calibration records;
- infrastructure and equipment maintenance records;
- training records; and
- recall records.

These records enable the processor to keep a check at every level i.e., from the raw material to the final product. Given concerns about antibiotic residues in Indian honey, the establishment engaged in honey export in India now maintains strict traceability records. Some firms have even started their own education and awareness programme as well as starting to register beekeepers.

All records maintained by the unit are verified The monitoring official verifies these through documentary evidence concerning hygiene conditions, bee diseases/ parasites; use of veterinary medicinal products , if any; good veterinary practices (GVP)/ good farming practices; controls exercised by the unit over bee production holdings; as well as processing and final packaging of honey for dispatch in the market.

Residue Monitoring Plan

Background

Residues 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 production techniques and because it is necessary to provide safe food to consumers, it is essential that adequate monitoring is in place to eliminate the possibility of the presence of residues in food commodities in excess of the prescribed levels.

Some importing countries, for instance, the European Union, want a residue-monitoring plan (RMP) for honey in place right from the level of the supplier. This will ensure monitoring and control at the processing level.

The Government of India, Department of Commerce (Ministry of Commerce and Industry), vide order dated 19 December, 2003, issued under the Export Inspection Council of India Act and published in the Gazette of India, authorised the Agricultural and Processed Food Products Export Development Authority to monitor the residues under a residue-monitoring plan (RMP) implemented through a Trade Notice giving notification of the procedure. RMP is aimed at establishing a system for monitoring residues of drugs, pesticides, and heavy metals in honey when the raw honey is received; at the honey processing unit; and in processed/ packaged honey. It also ensures a system for corrective action if residue levels higher than those established through this RMP are detected and for corrective action in the event of the issuance of an Internal Alert Information. The RMP covers all honey processing units intending to process honey for export and is carried out through recognised laboratories.

Procedures for the sampling and inspection of Nominated Laboratories and the National Referral Laboratory (NRL) for the purposes of sampling and testing in India is given in RMP Annex 1. The procedure to be followed by the nominated laboratories and by NRL for sampling and testing and methods of sampling for checking residues of drugs and pesticides are given in RMP Annexes 2 and 3. All honey exporters intending to export honey to the EU must supply the APEDA with their complete address and the contact details of all their honey processing/ manufacturing facilities and must register their processing units with the Export Inspection Council of India, and the respective Export Inspection Agencies as per procedure. Honey exporters must also indicate this registration number as per RMP Annex 4.

An authorised representative of the nominated laboratories visits the honey processing units of the exporter without any prior notice and draws samples on a random basis for testing as per the sampling plan. A sample slip as per RMP Annex 5 is filled up by the processor and signed by the authorised representatives of the processor and the laboratory. These samples are tested for drugs, pesticides, and heavy metals above the recognised limit (RMP Annex 6).

Accreditation/recognition requirements and responsibilities of nominated laboratories

All the nominated laboratories are accredited to the National Accreditation Board for Testing and Calibration Laboratories (NABL) as per ISO/ IEC-17025 and have APEDA recognition.

The nominated laboratories test for residue levels of drugs, pesticides, and heavy metals (listed in RMP Annex 6). The method of analysis is given by the Association of Official Analytical Chemists (AOAC), although any other validated method can be used. A test report must be issued to the honey-processing unit within one week of drawing the samples, as per the format given in RMP Annex 7. A copy must be sent to the APEDA, the EIC, and NRL. The nominated laboratories submit a bi-monthly statement of samples tested to NRL as per RMP Annex 8. If

the samples exceed the MRLs permitted, the nominated laboratory will immediately bring it to the notice of the NRL, EIC, and APEDA.

The nominated laboratories must communicate the details of the samples drawn for analysis to the NRL so that the NRL can draw 5 % samples as per the procedure given in Para 5.1 of MP Annex 3.

Responsibilities of the national referral laboratory (NRL)

The NRL monitors the work of nominated laboratories by conducting a surveillance audit on a six-monthly basis to ascertain that the laboratories are following the criteria laid down under the residue monitoring plan. The NRL audits the documents of a minimum of 5 % of the documents of the samples for which tests have been carried out by the nominated laboratories. On the basis of the data, the NRL also prepares a plan of action for the following year.

The National Referral Laboratory draws 2 % of the samples directly from registered honey suppliers, from the processing units of the exporters where raw honey is stored of as per the batches tested by the designated laboratories for drugs, pesticides, and heavy metals. The NRL analyses the samples and reports the findings to the APEDA and the EIC as per RMP Annex 7.

The NRL submits a quarterly statement (RMP Annex 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 to the APEDA and EIC.

The method of sampling/ testing/ analysis and validation are also prescribed by NRL. It is also the NRL's job to remain alert to any changes in the amendments regarding residue levels implemented by the importing countries, especially the EU. It verifies this information from the EIC and the APEDA as well as from the nominated laboratories.

The NRL also prepares a calendar and organises training programmes on testing procedures, methods of analysis, and so on for each contaminant or group of contaminants for the nominated laboratories. It prepares a calendar and organises proficiency/ inter-laboratory testing for the designated laboratories.

In cases where residue levels of drugs, pesticides, and heavy metals are found to be higher than the permitted levels, the NRL will issue Internal Alert Information as given in RMP Annex 10. This alert is issued without any delay. It also advises the exporters, the APEDA, the EIC, and the EIA about the control measures that must be taken. However, if, on re-testing, the samples pass the MRL requirement, the NRL revokes the Internal Alert Information with immediate effect. The NRL must inform all concerned parties about the new status. The NRL also conducts random checks of the records with regard to the work carried out by them.

Powers of the national referral laboratory

The NRL has the right to draw samples from honey collection centres, honey processing units, and nominated laboratories and to verify analysis data corresponding to the samples drawn and/ or tested by the designated laboratories. The NRL also has the authority to recommend to APEDA and/ or NABL the de-recognition of nominated laboratories in the event of non-compliance with the procedure for taking of samples, testing of honey, and so on.

Responsibilities of the export inspection council

The EIC has the responsibility to evaluate and send residue monitoring data to the European Commission. It must also evaluate the bimonthly and quarterly statements submitted by the nominated laboratories and the NRL respectively, and must suggest control measures. It is also charged with keeping the APEDA and NRL informed of

any information on excessive residues brought to their notice from any quarter.

The EIC utilises copies of test reports received from the laboratories for the purpose of verification when the honey is shipped. It also keeps the APEDA and NRL informed of any Government of India notifications on the use of drugs and pesticides and the prescribed residue levels, as well of any EU notifications or changes in the MRLs of residues of drugs and pesticides. The EIC also takes corrective measures in consultation with the APEDA and NRL.

Responsibilities of honey processors/ exporters

All registered exporters of honey provide a list of honey processing units to APEDA from where they intend to source honey for export to the EU. Each honey processing unit will maintain (as in RMP Annex 4), a record of the sources (farmers and suppliers) of honey in such a manner that the consignment exported can be traced back to the supplier of honey. A reference code number must be allotted to each of honey supplier, which must be mentioned on the sample slip. Processors should source honey only in food grade plastic/ stainless steel containers to avoid the problem of contamination from lead and other heavy metals.

It is also the responsibility of the processing unit to provide complete information about the honey supplier, and the batch number of the raw/ processed honey to the nominated laboratories at the time of sampling. The processing units must also maintain a record (as per RMP Annex 4). This record is made available to the laboratory representative at the time of sampling.

Surveillance mechanism

For effective monitoring, the APEDA nominates a committee consisting of representatives of honey exporters, designated laboratories, and individuals from the Export Inspection Council/ EIA under the leadership of the National Referral Laboratory. The APEDA also ensures implementation of the control measures suggested by NRL.

Penal provisions

In the event of a breach in the monitoring plan of drugs, pesticides, and heavy metal residues in honey, the APEDA may initiate action as per the provisions of Section 19(3), Chapter V of the APEDA Act, 1985. (An extract from Agricultural and Processed Food Products Export Development Authority Act is given in RMP Annex 11.)

Case Studies of Leading Honey Exporters

Kashmir apiaries

About the group

M/s Kashmir Apiaries Exports, a recognised export house in the honey trade, is part of the 'Kashmir Group' which includes another firm called 'M/s Little Bee Impex, a 100 % Export Oriented Unit', and 'M/s Kashmir Apiaries Private Ltd.', which is a company incorporated under the Companies Act, 1956, for domestic marketing of the product. The group's firms have achieved a total export turnover of INR 1,750 million (about US$ 34 million) and a total turnover of INR 2,500 million (about US$ 48 million) for the financial year ending 31 March 2009.

The group is a pioneer and leading honey export house both in bulk and in consumer packs, with got more than 100 overseas buyers in over 40 countries. In fact, it is the largest honey exporter, commanding first position in the export of honey. Its efforts have been duly acknowledged by the Government of India which has conferred on the firm the 'Best Exporter Award' for the last seven consecutive years. The group is also engaged in beekeeping activities on a large scale, managing about 25,000 bee boxes, besides giving technological assistance to other beekeepers in the state by providing them with the necessary inputs/ technology and also ensuring 100 % buy back of their production under contract farming agreements.

Through this arrangement, the group is not only getting good quality honey, it is also helping to increase the sale of beekeeping equipment, bee-hives, wax sheets and helps in keeping track of the total production and any difficulties being faced by beekeepers.

About the firm

M/s Kashmir Apiaries Exports

This is a recognised export house which has engaged in beekeeping, processing, and export of honey for more than the past eight years. The firm was established in 1997 by S Jagjit Singh Kapoor, an agriculture graduate, with three family members:

The firm which started on a very small scale in 1997 has grown by leaps and bounds and has established itself as a leading player in the honey trade. It is now is engaged in beekeeping, extracting, processing and export of honey and its allied products. The firm has been continuously receiving the Best Exporters Award in the field of agriculture from the Agricultural and Processed Food Products Export Development Authority (Agriculture Processing and Export Development Agency) under the Ministry of Commerce, Government of India for the last four consecutive years. The firm has steadily established itself in the market at both the domestic and international level through sheer professionalism of the management, headed by S Jagjit Singh Kapoor and his educated and enthusiastic sons. S Jagjit Singh Kapoor has also received a lifetime achievement award for his dedicated work in the beekeeping industry and in the development of the export market. He remains the Chairman of the National Bee Board, India, which is the biggest apex body formed by the Central Government, in which five to six members are from various sectors of the Government. He is also of the nominee members from the industry in the governing body of Agricultural and Processed Food Products Export Development.

Little Bee Impex

This 100 % export-oriented unit formed in September 2003. It partly started production of bulk honey in January 2004 and consumer bottled honey in May 2004. It is registered with Noida export processing zone under the Ministry of Commerce and is enjoying 100 % income tax rebate under Section 10B of the Income Tax Act 1961 up to the financial year 2010-2011. It has the capacity to export 10000 tonnes per annum of bulk honey and 3000 tonnes for consumer pack bottled honey. Its export has risen from INR 190 million (about US$ 4 million) in 2004-2005 to INR 500 million (US$ 11 million) in the last financial year 2005-2006. Net profits have also risen from INR 12.5 million (US$ 280,000) to INR 70 million (US$ 1.6 million) in the same period. The number of export buyers in the consumer pack section has also increased from 10 to more than 50. It has complete infrastructure comprising approximately 50000 sq.ft of building, a plant for processing/ packing honey, an empty pet bottle manufacturing plant, and a carton/ bee boxes manufacturing plant, which gives tremendous value addition.

Existing infrastructure

- Building: the unit has own factory which is spread over about four acres of land and with about 50,000 sq.ft being the constructed area. These factory premises are owned by the partners and their family members. The building includes a new office block, two production halls, honey receiving and storage go-downs, a machinery section for wax sheets, as well as laboratories and a cold storage plant. The factory has a power load of 623 kVA and a self possessing generator set of 125 kVA. There is another unit in the name of Little Bee Impex (100 % EOU) at the back of Kashmir Apiaries Factory premises, built on about three acres of land. Other than this, the partners possess another 30 acres of land adjoining the factory premises for future expansion.
- Plant and machinery: the unit has all the machinery to process honey, which includes heating/ filtration plant (heating chambers and blowers), a moisture reduction plant, as well as storage tanks and filler machines. In addition, it has imported equipment to carry out sample testing in its laboratory and also bee boxes/ wax sheet manufacturing facilities.
- Being the largest and foremost firm in beekeeping, it has decided to invest in this field to expand its captive production of honey. The firm has added about 4,400 bee boxes along with livestock at a total cost of INR 1 million (US$ 23,000), against which a term loan of INR 700,000 (US$ 16,000) has been disbursed by UTI Bank, Ludhiana, in January 2005. This enhancement of the captive production has resulted in better profitability, as the firm has immense experience in bee keeping activities. Honey received from its own bees farms is of organic quality and fetches better export realisation rates compared to honey received from other sources and exported.
- Labour: Honey collection is a very labour intensive job requiring a wide network of employees to collect the honey from various places. The unit employs about 100 workers in the factory and 300 for beekeeping activities.
- Installed capacity: At present, the installed capacity of the unit for processing bulk honey is about 40 tonnes per day (two container loads). Based on this, capacity per annum for 200 working days is 8,000 tonnes, as honey is not available throughout the year.
- Purchase network: The unit has got trained and experienced staff for the procurement of honey across the country. It has a wide network of beekeepers, traders and its own field staff for a continuous supply of good quality honey. It has its own fleet of about 15 commercial vehicles to collect the honey.
- Marketing: The firm has been engaged in the direct export of bulk honey in drums to Germany and the United States for the last five to six years. Due to the formation of the 100 % Export Oriented Unit (Little Bee Impex), most of the export sales have been diverted here. Now the firm is selling honey to this 100 % EOU as deemed exports instead of making direct exports. However, the firm has also exported honey directly to its existing buyers, amounting to INR 70 million (US$ 1.6 million) during 2006. In addition, the firm will supply honey to the domestic customers, which includes major buyers with whom the firm has existing connections.

Manufacturing process

The firm is engaged in beekeeping, processing, and export of honey. It receives raw honey in containers such as tins/ cans/ drums from the beekeepers spread all over India. This raw honey received is of a crude type and contains certain foreign bodies such as dirt, impurities such as wax, as well as dead bees. Sample tests are done in the factory laboratory to check moisture content, purity, quality, as well as other required tests such as the presence of antibiotics. After quality checking, the honey is filtered in filtration plant. The filtered honey is then transferred to heat chambers for heating; afterwards it passes through pipelines to moisture reduction plants for removal of water. The moisture is reduced to meet international standards as buyers accept honey containing minimum moisture contents from eighteen per cent to twenty per cent. This processed honey is shifted to large storage drums through a pipeline for packing in epoxy coated drums for export in bulk.

For consumer packs (100 to 500 g), moisture reduced honey is again passed through pasteurisation-cum-filtration plants to check for and remove foreign bodies and to ensure that honey thus packed remains in liquid form. The honey is put into small containers on a continuous packing line, labelled (manually), sealed (capped), packed in cartons, shrink wrapped, and dispatched.

Kejriwal enterprises

Kejriwal has established India's largest state of the art facility to handle 15,000 tonnes per annum to meet the growing demand of international and domestic customers. The facility is fully insulated to maximise shelf life and to retain the goodness of the honey, i.e., its characteristic aroma, colour, and flavour. All handling operations are fully automatic and the well-designed closed-circuit honey processing line with no manual interface ensures that the quality and hygiene of honey is ensured at all points. All critical points during handling are managed by a technically competent workforce to ensure quality, hygiene, and traceability.

Honey packaging

Bulk packaging is done in food grade epoxy coated barrels and buckets according to the buyers' requirements. Retail packaging is done in customised bottles and jars. Companies supplying to the retail market can outsource their handling and packing requirements from Kejriwal's.

Lab capabilities

Kejriwal is the only Indian honey packer with a National Accreditation Board for testing and Calibration laboratories (NABL)-approved, in-house lab - the Centre for Analysis Research and Training (CART). CART is an independent food-testing lab, which has been recently established and accredited by NABL in biological and chemical disciplines. The lab is well-equipped with modern sophisticated instruments and technically qualified and experienced scientists for the analysis of honey as per national and international standards (USFDA, EU CODEX). CART had also established its competence as a globally recognised honey analytical laboratory.

Some its capabilities are as follows.

- AOAC methods to analyse honey quality and identity.
- Residue analysis for antibiotics and pesticides.
- Pollen count on all unifloral honey for their nomenclature.
- Microbiological test on raw and finished products, including aerobic plate count and yeast and mold count.
- Continuous quality monitoring of production specifications such as colour, moisture, and flavour.
- Complete commercial analysis including F/G ratio, HMF, diastase, and sugar profile.

Market-related Information of Important Honey Importing Countries

The honey to be exported should be of high quality as the global market is competitive and quality conscious. However, the regulations for importing honey vary from country to country. Information on quality and importer's requirements, custom duties, quantity restrictions and so on, for some importing countries are discussed below (these requirements may change from time to time).

Germany

Quality and importer's requirements

Germany is a highly quality conscious market and imposes stringent regulations on all honey coming into Germany. The German beekeepers' lobby is very strong and stipulates that all imported honey must conform to the high standards of domestically produced honey.

All imported honey has to confirm to EU regulations, individual buyers also have their own specific requirements. The honey market is mainly controlled by the few major importers who in turn supply the packers and industrial users.

It is difficult for new countries and suppliers not having any prior experience of export to this market to enter the German market as they find it very difficult to meet the quality standards set by the German importers. It is necessary for them to first make sure of the acceptance of their terms of quality by getting the honey tested by one of the premier honey testing laboratories which tests almost all honey imported into Germany. This laboratory is the Institute for Honey Research in Bremen.

The major parameters for honey quality are moisture content; hydroxymethylfurfural (HMF) content; diastase activity; and saccharose (sucrose) content. The pollen content of the honey is also tested to determine the botanical origin of the honey and its purity. Pesticide and antibiotic residue levels are an important issue in Germany, especially the use of streptomycin in the honey or other materials used for the control of mites and disease.

The German market is very particular about the plant origin of the honey. All honey purchased is from a specific plant source or is polyfloral or wildflower honey, which normally means that it has to be superior quality apiary honey.

There is a growing concern in Germany about the artificial moisture reduction of honey, which the Chinese practice on a large scale. There is now talk of testing the yeast content of honey to be able to determine if the honey has been artificially ripened as well as the presence of glycerol in honey which could be due to artificial moisture reduction. This matter is becoming of serious concern and is a point taken up by the strong lobby of local German beekeepers.

Germany is also in the forefront of ensuring that the EU monitoring system is used, where the honey must be traced back to the source of production and proper production methods used. No additional pesticides or antibiotics are allowed during the honey season to avoid residues. Furthermore, the honey must be naturally ripened and not extracted from brood frames or artificially ripened.

Customs duties

There is customs duty of 20.5 % on honey imported into Germany, except in the case of least developed countries that have a 0 % duty.

Quantity restrictions

There is a quantity restriction on the amount of honey that can be imported into Germany.

Legislation

Germany requires a veterinary certificate signed by a veterinary inspector to be provided by the exporting country, which specifies that the bee colonies from which the honey is extracted are disease-free within a radius of 5 kilometres of the bee colonies.

Market prospects

Germany is the hub of the honey market in Europe and is a large consumer of honey. The market has been dominated by cheap Chinese honey which has become attractive to the importers because the supermarket stores and discounters want cheap prices for the consumers and volume sales. Speciality honey has a limited market, with speciality honey from other countries being well established, such as Canadian Clover honey, Mexican Yucatan honey, Acacia honey from Romania, orange blossom, and other honey from various countries.

Germany is thus a market which has the potential for quality honey at a good price.

The United States

Quality and importers' requirements

The US standards for grades of honey are established by the US Department of Agriculture. US grades are based on four factors, moisture content, flavour, absence of defects, clarity, and colour. Federal law requires country of origin, labelling, and information on whether imported honey is packed or mixed with domestic honey while packing. The labels used on honey containers should state the contents, the name and address of the producer, the packer or distributer, the grade, and net weight. Nutritional information is also included on the labels.

The United States has no specific honey legislation, but a country grading scheme is in effect and the general provisions of the Food and Drug Act are applied. As most packers and industrial users buy foreign honey through an importer, they leave it to the importer to obtain the desired quality.

The following aspects are taken into account when honey is imported:

- The honey must be pure, adulterated honey is not acceptable.
- A moisture content of up to 18.6 % is allowed but many companies prefer an even lower percentage.
- The honey must be clean, i.e., free from filth (files, other insects, feathers, etc.) .
- The honey must be uniform in quality.
- The drums (normally of 300 kg) must be completely clean.

Unlike in Europe, no attention is paid to the HMF content or diastase activity.

A light coloured honey is preferred and honey is graded and imported on the basis of colour grades.

Importers buy honey on the basis of samples which should weigh at least 2 oz (56 g). The honey delivered should correspond to the agreed sample.

Customs duties

Honey is classified under item 155.70 of the Tariff Schedules of the United States (TSUS0. A rate of 1 cent per pound ($22.05/ tonne) is applied under column I of the TSUS to honey from all countries except 'designated non-market economy countries', which fall under 2 and are subject to a rate of 3 cents per pound ($66.15/ tonne).

Countries belonging to the Caribbean Basin Initiative pay no duty.

Quantity restrictions

The United States protects its own beekeeping industry and quantities and pricing of honey imported depend on the annual US domestic production of honey. Anti-dumping restrictions have been imposed only on Chinese honey since US beekeepers had filed an anti-dumping lawsuit on Chinese honey.

A quota system is imposed only on Chinese honey entering the US market.

Legislation

Honey comes under the purview of the Food and Drug Administration (FDA) since there are no specific official standards for honey. The FDA checks all honey imported into the country at the ports and FDA inspectors do not release goods unless they have been checked to see whether the honey that has arrived at the port is clean and free from any combination and is unadulterated. The C13 test is done to test if an imported product labelled as pure honey is not mixed with sugars.

The United States Department of Agriculture (USDA) has issued voluntary grading schemes which are widely used. For extracted honey there are four grades:

- US Grade A or US Fancy
- US Grade B or US Choice
- US Grade C or US Standard
- US Grade D or US Substandard

USDA grades for honey take into consideration flavour, colour, clarity, moisture content, and defects. Points are awarded, and the grade is determined accordingly. Further information may be obtained from the United States Department of Agriculture, Agricultural Marketing Service, Washington, DC 20250.

The honey container must indicate the name and address of the packer, the name of the product and its weight, and the containers must be marked in a conspicuous place in a legible, indelible, and permanent manner regarding the product and the ultimate purchaser in the United States and the name in English of the article's country of origin.

Market prospects

There are no quantitative restrictions on honey imports and customs duties are fairly low. The modified honey price-support programme has had a significant influence on imports. The United States has become the world's largest importer of honey. The major requirements for honey for this market are liquid consistency, very light colour, and low moisture content.

The United Kingdom

Market access

The United Kingdom import market for honey is not as stringent as the German market in terms of quality. The major tests carried out on imported honey are HMF, diastase, and moisture content. The C-13 test is now widely used by the industry for checking honey, especially Chinese honey.

One of the major requirements for imported honey is colour, as the market prefers a light amber coloured honey. Some pesticide residue testing is also done where the honey is suspected to contain pesticides.

There is a growing consumer lobby against genetically altered foods and plants, and honey from any such sources is not accepted in the United Kingdom.

Honey imported from India had quality problems in the United Kingdom market. In discussion with some buyers, it was found that honey imported from India had failed various tests and in one particular case, honey samples were taken by honey inspectors from the final packed honey which had been supplied to the market and the samples were found to be of poor quality. The honey had to be recalled and the problem was finally traced to honey from India which had been imported by one particular importer and was found to be substandard.

Customs duties

All imported honey coming into the United Kingdom is subject to a 21 % customs duty. All East European honey is subject to 19 % custom duty.

Quantity restrictions

There are no quantity restrictions on imports of honey into the United Kingdom.

Legislation

Imported honey has to conform to the Codex Standard. All imported honey is tested.

Recommendations for the Countries of the HKH Region

It is suggested that countries that want to export honey set up a national export council. Such a body can initially hire a consultant to detail the processes and infrastructure that needs to be developed for the export of honey. It is critical that the national export council should include an interdepartmental panel of experts from various fields with a background in food schemes. They need to meet various actors in the apiculture field such as beekeepers and processors and come up with recommendations and honey export potential of the country.

There are certain requirements that must be fulfilled before the product is approved for export to an EU member state. The requirements pertain to various honey standards, quality, packaging, traceability, and health. This can be achieved by following certain steps, as followed, below.

- Organisation of the network of concerned official and private agencies.
- Defining the honey route.
- Updating honey standards as defined by EU or target exporting country.
- Setting up monitoring plan for apiaries i.e., traceability.
- Setting up monitoring plan for residues in honey.
- Developing a plan to meet out health requirements.

Organisation of networks

Bee-based networks needs to be organised at a national level. This network should include private organisations such as processors, potential exporters, progressive beekeepers, scientists, and official members from line departments. It is recommended that networking be strengthened at the state level of various stakeholders to keep them active and updated. Such networking should be coordinated by the state body of the National Bee Board or the concerned authority. Bee-related activities at the institute or government level should also incorporate regular feedback for R&D activities and updating policies at state and national level. These state groups shall be an active group and should form the base for strong national networking.

Honey route

The 'honey route' needs to be defined. The honey route includes documentation on the geographical and botanical origin of the honey. Apiary technology adopted by beekeepers may also be documented. Based on this, a master plan may be developed to educate beekeepers and other related stakeholders and to encourage them to adopt the appropriate technology to meet international honey standards. This will also help in maintaining traceability records and monitoring and lowering residues. Such a strategy is important to meet the Hazard Capital Analysis and Critical Control Point specification, which refers to a proactive safety approach addressing potential critical points along the supply chain, especially at the production level, rather than inspecting a finished product.

Updating standards

Importing commissions have stipulated honey standards that must be met. These include sugar content, moisture content, hydroxy methyl furfural content, diastase activity, electrical conductivity and so on. Therefore, a country intending to export honey has to conform to international / Codex standards. The need for producer education/ awareness is of utmost importance. HMF, moisture content, and the use of antibiotics have been reported by

exporters as a major hindrance to a good quality product at the final stage. Other practices requiring attention are as follows.

- Many beekeepers harvest unripe honey, which leads to the moisture content being much higher than the defined limit of 20 per cent. This is happening mainly due to lack of awareness.
- Storage and transportation conditions for the harvested honey have a direct effect on HMF content, since prolonged exposure to high temperatures will lead to high levels of HMF.
- Beekeepers are using chemicals, including antibiotics, indiscriminately and not at the right time. This results in residues in the honey. It is recommended that the country needs to develop honey standards, taking into account its own standard, the Codex Alimantarius, and the European honey directive. If need be, special attention should be given to organic honey standards as well.

Traceability

In the present scenario of competitive global trends, consumers and other stakeholders are demanding regulation of the growing of food and its management on its way to the consumer. Information is needed about every part of the supply chain, which will provide the consumer with a guarantee of the quality of the product. Traceability refers to the availability of information of all processes and stages in the supply chain, and certifies the origin of the honey. Traceability adds value to the quality regulations by providing linkages for identification, verification of sources to meet country-specific standards as well as the expectations of consumer/ stakeholders.

Traceability also works as a proactive measure to avoid future risk, especially in case of disease outbreaks. Therefore, the exporting country should recognise the importance of traceability and the need to extend such requirements and needs, and to develop rules accordingly. The steps described in the next sections need to be taken as a part of maintaining traceability.

Monitoring of activities of approved establishments

It is important that a strong monitoring programme be developed at the country level to monitor the following activities/ records.

- Monitoring the responsibilities of the approved establishments towards developing their own work system to maintain GHP, GMP, and HACCP, from the procurement of raw materials to the final dispatch of the cargo.
- Monitoring disease control and sampling procedures as per GHP, GMP, HACCP (pre- defined quality practices).
- Monitoring records about traceability of honey, permitted chemicals, etc. maintained right from the source of production.

Effective quality control

Identification of beekeeping farms from which honey can be procured is necessary, as well as maintenance of traceability records for raw material procurement. The establishment of well-equipped labs with the latest technologies are required. The methods of AOAC, Codex/ other internationally recognised methods must also be adopted.

Traceability records

A well-defined system must be developed so that traceability records pertaining to the raw honey, other food ingredients, chemicals, packing materials, processing and final produce can be maintained.

The most important part in the traceability chain that needs to be strengthened is that of raw honey production and the use of chemicals in bee management. For this, a strong programme should be developed. Beekeepers producing honey for export need to be given exposure about the consequences if proper records are not maintained and in case they use chemicals indiscriminately. Exporters are also an integral part of this programme.

Awareness camps can be organised, for example, India's export houses are conducting awareness programmes at their level.

Setting up a plan for monitoring residues in honey

A core requirement for exporting honey to EU countries is a residue monitoring plan (RMP) approved by the EU. This plan intends to assess the ability of the official services of the exporting country to ensure the safety of the honey with regard to residues of chemical substances.

Due to concerns about food safety, RMPs are required when importing all animals and products of animal origin. Since honey is considered to be an animal product, the control of residues in honey is important to control traces of contamination that the bees have picked up. Therefore, countries intending to export honey must develop an RMP as per the pre-defined honey standards. India's RMP, as described in this document, is a good example, and covers all aspect of an effective RMP for exporting honey to any country, including the EU. The RMP should include the procedure for sampling and inspection, as does India's RMP. The laboratory registered for this job needs to be well-equipped and must be knowledgeable about international standards and the AOAC analysis method for testing the residue levels of drugs, pesticides, and heavy metals. Training programmes at the national level should also be organised on a regular basis to enhance the skills of the designated laboratories. Some agencies/ departments at the country level should also be strengthened and empowered to draw samples from the various honey collection centres, honey processing units, and designated laboratories to verify the analysis data and take appropriate action in case of non-compliance in the drawing of samples or testing of honey.

Develop a plan to meet health requirements

Health requirements are linked to food safety, which in turn is linked to food-borne hazards at the point of consumption. Health hazards are a major concern for any food commodity, including honey. Since food safety hazards can occur at any stage in the food chain, adequate controls should be in place. Presently, the ISO 22000 (derivative of ISO9000) is standard developed by the international organisation for standardisation dealing with food safety. All honey intended to be sold in the EU market needs to fulfil the requirements concerning the definition of honey, classifications of honey, and labelling and composition criteria that are stipulated in the Council Directive. Therefore, the exporting country is supposed to develop a plan to meet health requirements.

For honey imported into the EU, the following information, in the language of the importing country, must be included on the label:

- The name under which it is sold.
- The gross and net weight.
- The date of minimum durability - 'best before'.
- The name and address of the manufacturer, packager, or importer established in the EU.
- Place of origin or provenance.
- Lot marketing on pre-packaged foodstuffs with the marking preceded by the letter 'L"'.
- Drum number (if exported in bulk).

For a product to be labelled 'honey' when exported to the EU, there are certain limits stipulated in the directive. No ingredient of honey is to be removed, unless it is unavoidable during the removal of foreign materials. Filtered honey, baker's honey, comb honey and other types of honey that have been altered or which are of inferior quality can therefore, not be labelled simply as 'honey'.

Packaging is another area where precautions are to be taken not to contaminate the final product. The import of materials and articles intended to come in contact with food is controlled by a regulation which states that, "any material or article intended to come in contact directly or indirectly with food must be sufficiently inert to preclude

substances from being transferred to food in qualities large enough to endanger human health or to bring an unacceptable change in the composition of the food or a deterioration in its organoleptic properties". The material used to manufacture the packaging material is important for exporters, not only for safety reasons, but also in terms of both quantity and marketing and value addition. Hence proper packaging material should be available in the country or imported and made available to exporters.

Organic honey

In addition to the above points, a country intending to export organic honey must comply with the rules laid down by the Council Regulation on organic production, labelling of organic products and control. The regulation aims to promote quality products and the integration of environmental conservation into agriculture. Only when these requirements are met is the exporter authorised to label the products with the community logo for organic products when selling them on the EU market.

The specific EC rules for natural organic honey generally include the following.

- The apiary must be placed with a three km radius of nectar and pollen sources, consisting essentially of organically produced crops and/ or spontaneous vegetation.
- Artificial feeding must carry organic certification.
- There must be immediate treatment of diseases.
- Mutilation such as clipping the wings of queen bees is prohibited.
- Chemical fertilisers are not allowed.
- The hives should be made of natural materials.

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Annexes:
Honey Quality Instructions (Honey)

Document No. EIC/Honey Ex. Instruction /September, 2008/Issue - 3

EXECUTIVE INSTRUCTIONS

APPROVAL AND MONITORING
OF
PROCESSING ESTABLISHMENTS
FOR EXPORT OF

HONEY

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EXECUTIVE INSTRUCTIONS FOR QUALITY CONTROL AND INSPECTION OF HONEY

1. INTRODUCTION

1.1 Subsequent to globalization due to signing of WTO agreements, quality and safety have become major criteria for deciding acceptance of a product in international trade. In order to ensure quality and safety of the products, there is a shift in approach of food regulators all over the world from final product testing to the process controls through implementation of Quality and Food Safety Systems such as ISO 9000, ISO 22000 and Hazard Analysis Critical Control Point (HACCP) system.

1.2 In the light of these developments, approval of honey processing plant based on process control approach have been introduced along with consignment wise inspection by Government of India, Ministry of Commerce & Industry issued Order & Notification No. SO.276 (E) & S.O. 277 (E) both dated 4th March 2002

1.3 These notifications envisage that it is the primary responsibility of the industry to ensure that honey intended for exports is processed and handled at all stages of production, storage and transportation based on Good Manufacturing Practices (GMPs) and Good Hygienic Practices (GHPs) and the product shall confirm to specifications given in the order by Central Government under Clause (c) section - 6 of the Export (Quality Control and Inspection), Act 1963 and keep records as appropriate. EIAs have been designated as Competent Authority to ensure compliance by the exporters with requirements as per clause-3 read with clause-4 of the Notification No S.O. 277(E) dated 04.03.2002.

1.4 These Executive Instructions are intended to facilitate smooth functioning of the system by checking compliance to the requirements of the GOI order & Notification No. S.O. 277(E) & S.O. 278 (E) dated 04.03.2002 and are updated by taking into consideration of the requirements of Regulation (EC) No. 178/2002, Regulation (EC) No. 852/2004, Regulation (EC) No. 853/2004, Regulation (EC) No. 854/2004, Regulation (EC) No. 2377/90, 1530/2002, Directive 96/23/EC, 2001/110/EC, Directive 2000/13/EC, Regulation 1664/2006, Directive 2002/337/EC.

2. PROCEDURE FOR APPROVAL OF ESTABLISHMENT

2.1 Application for approval

2.1.1 The establishment intending to process honey for export shall submit the application for approval in the prescribed format placed at **Annexure I (Pg. 37- 50)** in duplicate along with documents given at 2.1.3 to the nearest office of EIA under whose jurisdiction the establishment is situated.

2.1.2 Application fee as given in clause 18 shall be paid by the applicant by way of demand draft drawn in favour of the Export Inspection Agency concerned along with the application form.

2.1.3 The application shall be accompanied by the following documents:

a) HACCP Manual (including the Sanitary Standard Operating Procedures, process flow chart (s) with product description, manufacturing details in each step , Self-Residue Monitoring Plan.)

b) In the case of establishments meant for export to the EU, attested/certified copy of test report from EIA lab/EIC approved lab in respect of water complying with EC directive No.98/83/EC dated 3.11.1998 used during processing activities.(not later than 6 months).

However, in the case of establishments meant for export to countries other than EU, the water needs to be tested as per IS: 4251, not later than 6 months. (Other than radiological parameters) from EIA Lab/EIC approved laboratory

c) Location and Layout plan of the establishment (site plan and building plan in A-4 size), showing all infrastructure and equipment facilities.

d) Layout showing the process/product flow, personnel flow, water flow (Indicating serially numbered water taps) and effluent flow, on A4 size paper separately, in evidence of meeting food safety requirements

e) Attested/ Certified copies of documents proving legal identity of the applicant establishment and scope of their operations.

f) Attested/ Certified copy of lease agreement for the premises and building, where ever necessary.

g) List of identified regional/district bee keeping farms, from which the establishment intend to procure raw honey for processing along with details like address, and distance from the processing establishment.

h) Bio-data of the veterinarian(s)/technologist(s)/ chemist, with attested copies of degree certificate(s experience certificate(s) and appointment letter/certificate of employment from the establishment and certificate of approval of EIAs if the same is available.

i) An Undertaking and Guarantee in the formats placed at **Annexure IA (Pg. 51)** and **Annexure IB (Pg. 52)**

j) Attested/ Certified copy of consent letter issued by Pollution Control Board concerned. (In case the consent letter is not available at the time of applying for approval this shall be submitted before the grant of final approval. However in such cases copy of the application made to Pollution Control Board (PCB) shall be submitted at the time of filing application for approval to EIA concerned).

k) Attested/ Certified copy of the order allotting Importer Exporter Code number (IEC).

l) **Note:** In case where a non-EU approved establishment submits application for the approval to process Honey for exports to the EU countries, the documents, which were submitted earlier, need not be submitted again, if there is no change.

2.2 Processing applications for approval

2.2.1 Applications received shall be scrutinised by the EIA office where it has been received and the discrepancies/ shortcomings observed should immediately be communicated to the applicants for rectification. A copy of application along with relevant documents and comments of the Officer In-charge of Sub-Office or Officer In-charge of Food Scheme (as applicable) shall be forwarded to In-charge of the Agency within seven working days after receiving it complete in all respect.

Adequacy audit of the HACCP manual and SSOPs shall be carried out by an EIA officer, having adequate knowledge of HACCP authorised by In-charge of the Agency. The adequacy audit report as per **Annexure IIA (Pg. 59)** along with the Audit Observation sheet at **Annexure IIB (pg. 60)** and the documents shall be forwarded to the In-charge of the Agency within five working days.

The application shall further be scrutinised by In-Charge of Food Scheme or a suitable officer authorised by him and deficiencies, if any, shall be communicated to the applicant for rectification.

2.2.2 When the application is complete in all respect, In-charge of the Agency shall depute a suitable officer as required by Clause 2.3.2 as Convener of Inter Departmental Panel (IDP) for assessment of the establishment.

2.2.3 Application pending for more than one year due to non-compliance by the establishment shall be rejected. However, the unit may apply afresh with all required documents and fees.

2.3 Assessment of the establishment

2.3.1. The Convener of IDP shall ensure that assessment of applicant establishment is carried out within fifteen working days of receipt of their application complete in all respect.

In case of initial approval of the establishment, the IDP shall assess the unit in two stages. In the first visit the IDP shall assess the infrastructure and equipment facilities of the establishment and also their compliance of regulatory requirements specified in the GOI Notification/ Executive Instructions and if satisfied recommend for the **conditional approval** of the establishment

In case the Competent Authority grants conditional approval, the establishments will be allowed to start processing of honey meant for export (however, export to the EU countries will be permitted only after the acceptance by EC). The processor shall intimate the Agency as soon as production has commenced. While the processing activities are in progress, an IDP shall visit the establishment again for on-site verification of compliance with the regulatory requirements specified in the GOI Notification/ Executive Instructions with respect to the GHP, GMP and HACCP based procedures Based on the satisfactory assessment report of the IDP, the approval shall be granted to the establishment by the Competent Authority.

However, in cases where a non-EU approved establishment submits

application for the approval to process honey for export to the EU countries, the conditional approval is not required. In such cases, the IDP may conduct assessment of infrastructure facilities and HACCP implementation of the establishment in the first instance itself and if satisfied recommend for the approval of the establishment. In such cases, the establishment should ensure that the processing activities are in progress in the establishment during the IDP visit and shall demonstrate the compliance with GHP, GMP and HACCP and other regulatory requirements.

2.3.2. The composition of IDP shall be as constituted by EIC from time to time.

2.3.2.1 Members of the Inter Departmental Panel will be decided by the In-charge of the Export Inspection Agency from the composition of IDP as constituted by EIC*.* The EIA representative of the IDP (convener) shall be an officer at the level of Deputy Director, having background (qualification/experience) of Food Schemes.

Note: 1. The present IDP comprises EIA, representatives from Agricultural & Processed Food Export Development Authority (APEDA), MoFPI, DMI, Department of Horticulture, Ministry of Agriculture.

2. In unavoidable circumstances, a senior Assistant Director having relevant qualification and enough experience in food scheme may be nominated as EIA representative by the In-charge of the Agency.

2.3.2.2 The quorum of IDP shall be three.

2.3.3 The IDP shall assess the infrastructure and equipment facilities of the unit and also documentary records of the Bee keeping farms. The prescribed Assessment Report Format placed at **Annexure IIIA (Pg. 62-72)** shall be used for reporting its observations. (The requirements for the approval of the establishment to process honey meant for export is enclosed at **Annexure IC (Pg. 53-56).**

In case the IDP finds any deficiency during its assessment, the same shall be recorded in the non-conformity report which shall be counter signed by the representative of the establishment as a token of acceptance as per **Annexure IV (pg. 78)**. The copy of the NCR may be handed over to the establishment along with any observation for improvement. Additional suggestions for improvement, if any, shall be given to the processor separately, the implementation of which shall not be a part of the approval procedures.

The IDP convenor shall submit the assessment report and recommendations of the IDP to the In-charge of Export Inspection Agency within three working days of completion of the visit to the applicant's establishment. In case verification of rectifications of the deficiencies is needed, the same may be undertaken as per the time frame prescribed by the Panel (maximum three months from the date of intimation of deficiencies to the establishment). The verification report shall be submitted to the

Agency In-charge within three working days of verification. The recommendations of the Panel shall clearly state whether the applicant's establishment is recommended for **approval/conditional approval or not.**

Note: Enough flexibility shall be given while assessing. The aim shall be to avoid the cross contamination which can also be achieved by time and space separation.

2.3.3.1 If the unit does not submit the compliance report within time frame , application may be treated as cancelled.

2.3.4 The report of the IDP visit shall be examined by the In-charge of the Export Inspection agency concerned. The following three situations may arise:

2.3.4.1 In case, the IDP recommends approval/conditional approval to the establishment and if agreed to, by the In-charge of EIA, the In-charge of food scheme, shall take following actions

Note: The conditional approval is given to the establishment on the initial stage of approval after satisfactory assessment of infrastructure and equipment facilities.

a. Allot an approval number to the establishment in the following manner

EIA-Mumbai	Honey/ 01/ Factory No / Year of Approval
EIA-Kolkata	Honey/02 / Factory No / Year of Approval
EIA-Kochi	Honey/03 / Factory No / Year of Approval
EIA-Delhi	Honey/04 / Factory No / Year of Approval
EIA-Chennai	Honey/05 / Factory No / Year of Approval

("Factory No" shall be allotted in serial order i.e., 001, 002 etc.) For example: for the first approved unit at EIA- Kochi in the year 2007, the unit shall be allotted approval No. "Honey/03/001/ 2007".

b. Open a file with 4 parts: Part A, Part B, Part C and Part D.

"Part A" shall bear the Approval Number followed by suffix "A" (e.g. "Honey/03/001/2007- A"). This file shall contain approval documents such as application for approval/renewal, IDP assessment reports, approval of additional facilities, Technologists, merchant exporter and other correspondence relating to the unit.

"Part B" file shall bear the approval number followed by suffix 'B'. (e.g. "Honey/03/001/2007-B") This file contains copies of monitoring reports, supervisory visit reports, NCR (Non Conformity Report), Suggestions for improvements and laboratory test reports.

"Part C" file shall bear approval number with suffix 'C' (e.g. "Honey/03/001/2007- C") and shall have copies of Certificate for Export (CFE) issued by the unit and Health Certificates issued by EIA.

"Part D" file shall bear approval number with suffix 'D' (e.g. "Honey/03/001/2007- D") and have details of foreign Complaints including all relevant papers and details of action taken regarding "On Alert" etc.

All records of file A and D shall be kept as permanent records. However records of File B and C shall be kept for at least four years.

c. The conditional approval is granted by the In-charge of the Agency for a period of three months from the date of approval, which may be extended to a maximum period of six months. The conditional approval shall be intimated to the establishment as per the format given at **Annexure VI (Pg. 80-81).**

2.3.4.2 In case, the IDP does not recommend approval and if agreed to, the In-charge of the EIA shall convey the same to the applicant, within seven working days of the receipt of the IDP report, along with the reasons for which applicant establishment has not been considered fit for full/conditional approval in the prescribed format **Annexure V (Pg. 79)**

2.3.4.3 In case of deficiencies in infrastructure and equipment facilities as reported by the IDP, which can be rectified within a reasonable time (maximum of three months from the date of intimation to the establishment), either the IDP or Convener of IDP as may be decided by Agency In-charge concerned (see clause 2.3.2) may carry out on-site verification of the corrective action/measures taken by the unit.. Further, procedure shall be followed as per clause 2.3.4 as applicable.

2.3.5 The establishment shall be allowed to process honey in their establishment for all destinations including EU after grant of approval/Conditional approval. However, actual export to the countries of the EU shall commence only from the date of EIC approval, based on the EC notification, if applicable. EIA concerned shall start issuing health certificate to the establishment on behalf of EIC from the date of EIC letter.

In the meantime, the establishment shall be allowed to process and export honey to countries other than EU.

2.3.6 The conditionally approved establishment on starting production shall ensure compliance with the requirements of GHP, GMP and HACCP and inform the EIA concerned for arranging the second IDP visit for conducting HACCP auditing and also to assess the adequacy of the processing activities of the establishment. The establishment should have production of honey in their unit at the time of IDP Visit.

2.3.7 The IDP shall assess the unit for compliance with the requirements of GHP, GMP and HACCP by an on-site visit and submit its report to the In-charge of the Agency in the prescribed format placed at **Annexure IIIB (pg. 72 -77)**. The deficiencies observed, if any, in HACCP implementation, GMP etc. are recorded in the report as per **Annexure IV (Pg. 78)** and a copy of the same shall be given to the processor for corrective action which shall be carried out within a maximum period of one month, there after verified by the official(s) as decided by the Agency In-charge concerned. If required, the IDP shall recommend the extension of the conditional approval of the unit beyond three months. However, in any case the conditional approval will not be extended for more than six months from the initial date of conditional approval.

2.3.8 On satisfactory completion of assessment of GHP, GMP and HACCP, the IDP shall recommend grant of approval and submit report to the In-charge of the Agency within three working days after the completion of the

assessment.

2.3.9 If satisfied, the In-charge of the Agency shall grant the approval of the establishment for a period of one year from the date of the conditional approval, which shall be intimated to the unit as per the format specified at **Annexure VII (Pg. 83)** with a copy marked to EIC. The certificate of approval shall be issued by EIC as per the format specified at **Annexure VIII (pg. 84).**

2.3.10 Once the In-Charge of Agency grants the approval to the establishment, the existing list of the establishment(s) shall be updated by including the name of this establishment by EIC and a copy of the updated list along with specific recommendation for approval shall be submitted directly or through MoC&I, sent to the Mission of India in Brussels for submitting to EC, with copies to Customs and EIA concerned.

3 APPROVAL OF VETERINARIAN/TECHNOLOGIST/ CHEMIST

3.1 The Inter Departmental Panel (IDP) shall grant the approval of veterinarian(s)/ technologist(s)/ chemists only after satisfactory assessment. For this purpose, an individual intending to get approval as a veterinarian(s)/ technologist(s)/ chemists shall submit an application in duplicate, as per the format given at **Annexure IX (pg. 85)** along with prescribed fee given in clause 18, to the controlling office of EIA.

3.2 The Head office of EIA shall arrange assessment of the veterinarian(s)/ technologist(s)/ chemists by the IDP, constituted as per clause 2.3.2, who shall submit the report as per the format given at **Annexure IXA (86-87).** On approval of Veterinarian(s)/Technologist (s)/ Chemist, a certificate of approval shall be issued as per the prescribed format placed at **Annexure IXB (Pg. 88)** by the EIA concerned.

3.3 The approval granted to the veterinarian(s)/ technologist(s)/ chemists is valid for two years from the date of approval and after two years the veterinarian(s)/ technologist(s)/ chemists shall apply afresh to the controlling office of EIA along with the required assessment fee as prescribed in clause 18, for re-assessment of the veterinarian(s)/ technologist(s)/ chemists by the IDP.

3.4 In case an approved veterinarian(s)/ technologist(s)/chemists of an establishment shift to another processor, there shall be no need for fresh assessment. The processor shall inform the EIA of any change in Veterinarian(s)/Technologist (s)/ Chemist.

4 PROCEDURE FOR APPROVAL OF ADDITIONAL FACILITIES/ ACTIVITIES OF APPROVED ESTABLISHMENT

4.1 The approved establishments seeking approval of additional facilities/activities shall submit their application in the prescribed format placed at **Annexure X (Pg. 89- 91)** in duplicate along with relevant documents as mentioned in the application form to the controlling local office of the Export Inspection Agency and also with the application fee as prescribed in clause 18.

4.1.1 Application(s) received shall be scrutinised and the discrepancies / shortcomings observed shall be immediately communicated to the applicant for rectification. In case of the approval of additional processing activity, the revised HACCP plan addressing the new activity shall be submitted to the EIA concerned along with the process flow chart for verification. Adequacy audit of the HACCP manual with respect to the additional activities shall be done by EIA officer(s) authorized by the In-charge of the Agency.

4.1.2 Applications complete in all respect shall be forwarded to the Head office of EIA. The In-charge of the Agency shall decide whether the assessment of the establishment to be carried out by the IDP or by the In-charge of food scheme / EIA official, depending upon the nature of additional facility/activity requested for approval.

4.1.3 The Convener-IDP/In-charge of Food Scheme shall ensure that assessment of the additional facility/activity of applicant establishment is carried out within fifteen working days of receipt of their application complete in all respect.

4.1.4 The prescribed Assessment Report Format placed at **Annexure XA (Pg. 92-95)** shall be used for reporting the observations.

4.1.5 In case any major or serious deficiencies are observed during assessment, these shall be brought to the notice of the establishment through the NCR at **Annexure IV (Pg. 78)** for taking corrective action within an agreed time period, maximum of one month. The rectifications conducted by the establishment are verified by either the IDP or by the Convenor of the IDP/ EIA official as may be decided by the In-charge of Agency concerned.

The report and recommendations shall be submitted to the In-charge of the EIA concerned within three working days of completion of the assessment of the applicant's establishment. The recommendations shall clearly state whether the additional facility/activity is recommended for approval or not.

4.1.6 The In-charge of the EIA concerned shall examine the assessment report of the IDP/In-charge of the Food Scheme.

4.1.7 In case the IDP/In-charge of the Food scheme/ EIA official recommends the additional facilities/activities for approval, the In-charge of EIA shall approve the additional facility/activity and inform the unit concerned within three working days of the receipt of the assessment report.

4.1.8 In case the IDP/In-charge of the Food Scheme/senior EIA official does not recommend approval, the In-charge of the EIA concerned shall convey to the applicant, within seven working days of the receipt of the IDP report, the reasons for which the additional facilities/activities of the establishment have not been approved.

Note: In case, the processor wants to incorporate the additional process activities in the certificate of approval, the original certificate of approval issued earlier shall be submitted to EIA for incorporation of the new process activities.

5. PROCEDURE FOR RENEWAL OF APPROVAL OF ESTABLISHMENT

5.1 The approved establishment seeking renewal of approval shall submit application(s), in duplicate, at least ***Sixty days*** in advance of the expiry of earlier approval to the controlling local office of the EIA in the form prescribed at **Annexure XI (Pg. 96-97)** along with relevant documents and application fee as prescribed in clause 18. EIA may remind the processor **(**As per **Annexure XII*)* (Pg. 98) Seventy five *days*** before the expiry of the approval.

5.1.1 Application(s) received shall be scrutinized and any discrepancies / shortcomings observed shall be immediately communicated to the applicants for rectification.

5.1.2 Applications, complete in all respect shall be forwarded to the In-charge of the Agency for arranging assessment of the establishment.
The Convener-IDP shall ensure that assessment of applicant establishment is carried out at the earliest.

Note: It shall be ensured by the In-charge of the Agency and the IDP Convenor that all formalities for the renewal of approval are completed before the expiry of approval. The IDP shall be arranged in consultation with the applicant. It should also be ensured that the establishment is in operation during the IDP visit.

In case the establishment does not apply for renewal in time and if the renewal of approval is not completed within the validity period due to the delay on the part of the processor and the approval granted to the unit lapses, the establishment will need to apply for fresh approval.
The IDP shall use the prescribed Assessment Report format placed at **Annexure XIII (Pg. 99 - 104)**

5.2 In case the IDP finds any deficiency during assessment, these shall be listed in the NCR**, (Annexure IV) (Pg. 78)** a copy of which shall be given to the establishment for taking corrective action within an agreed time period. The IDP shall submit its report and recommendations to the In-charge of the EIA concerned within three working days of completion of its assessment of the applicant's establishment. The recommendations of the IDP shall clearly state whether the applicant establishment is recommended for renewal of approval or not.

The assessment reports shall be examined by the EIA concerned.

5.2.1 If the IDP does not recommend for renewal of approval, the In-charge of the EIA concerned shall withdraw the approval granted to the establishment within three working days of the receipt of IDP report, with due intimation to EIC for informing the same to the EU, where applicable.

5.2.2 In case the IDP recommends renewal of approval and the in-charge of Sub-Office submits the satisfactory performance report as per the **Annexure XIV (Pg. 105)** the In-charge EIA shall grant the renewal of approval for a period of one year from the date of expiry of earlier approval and inform the establishment accordingly, with a copy marked to EIC.

5.2.3 Certificate of approval shall be issued by EIC as per the prescribed format placed at **Annexure VIII (Pg. 84)** and sent to the processing unit through the EIA concerned. The certificate under normal circumstances shall be valid for a period of **one year** from date of expiry of earlier approval.

6. PERMISSION TO PROCESS AND PACK HONEY FOR EXPORT BY MERCHANT EXPORTER

6.1 Approved establishments shall be permitted to process and pack honey for export by one or more merchant exporter(s), depending upon their production capacity. However, only a maximum of three merchant exports are permitted at a given time.

6.2 Approved honey establishments and the merchant exporter(s) shall also be permitted to export "on account" of Export Houses, Trading Houses, Star Trading Houses or Super Start Trading Houses only. However, it may be ensured while issuing Certificates for Export (CFE) for such "on account" export, the column no.1 of the certificate should contain the details of the exporter as well as the " on account" exporter.

6.3 Establishments intending to process and pack ***honey*** on behalf of merchant exporter(s) should submit their application to the EIA concerned as per the format given at **Annexure XV (Pg. 106),** along with a fee as prescribed in clause 18 and also the documents specified therein. Application complete in all respect shall be considered by EIA, based on the capacity fixed for daily production Vis-a -vis the requirements of the merchant exporter(s)

6.4 Approval to process/handle honey meant for export by the merchant exporter(s) is given by the EIA concerned as per the format given at **Annexure XVA (Pg. 107).**

6.5 Certificate for Export (CFE) issued by the approved establishment meant for export for the merchant exporter/ Export House is to be got counter signed by the EIA concerned, for which a fee as prescribed in clause 18 has to be paid for each certificate by the processor to the EIA concerned. The EIA may collect the monitoring fee directly from the merchant exporter on request from the approved establishment.

6.6 When an approved processor requests EIA for cancellation of permission given to process and pack honey for any merchant exporter, the permission shall be withdrawn using format given at **Annexure XVB (Pg. 108).**

7. CHANGE IN THE NAME OF THE COMPANY

7.1. In case there is a change in the name of the company, the establishment shall furnish the following documents to the controlling local office of the EIA under whose jurisdiction the establishment is situated:

(i) Attested/Certified legal documents relating to the change

(ii) Any other relevant document (Ref: documents listed in clause 2.1.3 e, f, i, j, and k)

7.2 In the case of request for transfer of approval under a **Wet Lease Agreement** (an agreement wherein the approved establishment is leased out to another party with all approved facilities including personnel without any change except that the party which has taken the approved establishment on wet

lease will be the new processor), or in case of change in ownership without changing the approved facilities including personnel, the processing unit shall furnish the documents mentioned at 7.1 to the EIA.

In addition, the party taking the approved establishment on wet lease or purchase shall also request for transfer of the approval in its name without change of approval number and submit the undertaking and guarantee required to be given by all approved processors, along with other legal documents relating to taking over the establishment on wet lease/sale deed.

On receipt of the above documents EIA In-charge shall examine the validity of such documents and on being satisfied shall approve the change of name/transfer of approval and inform the establishment with intimation to EIC. In case of EU approved establishment, EIC shall inform the change of name to the EU

Note: (i) In the above case, there will not be any physical shifting or restructuring of infrastructure facilities of the factory and the managerial, supervisory personnel, workers and the HACCP programme will continue to be the same.

(ii) As certain time may be required for informing the EU/ importing country, arrangements are to be made for exporting the consignments to the EU/ other country in the name of old company during the interim period

7.3 In case there is change in the ownership with change in the premises, manpower or process etc., a fresh approval as per the prescribed norms will be required.

8. RESPONSIBILITIES OF THE APPROVED ESTABLISHMENT

8.1 General

a. As the sole responsibility in maintaining the quality and safety of the products processed in the establishment lies with the approved establishment, it shall maintain GHP, GMP and HACCP based own check system. The establishment shall exercise proper controls at all stages of production starting from raw material procurement (including honey production control) to the final despatch of the cargo and maintain records thereof. The establishment shall comply with all the regulatory requirements of the GOI Order and Notification S.O. 276(E) dated 4th March 2002 and S.O.1441(E) dated 19th December 2003, as well as those specified by the importing country and by EIC from time to time.

b. Establishments shall maintain all the approved infrastructure and equipment facilities of the unit in good repair. For major alterations/ changes in the infrastructure and equipment facilities, prior approval shall be taken from the Competent Authority.

c. All the controls and sampling procedures shall be in compliance with GHP, GMP and HACCP. Proper control of CCPs shall be ensured and any deviation in the process flow or, changes made in the HACCP Manual shall be brought to the notice of the EIA concerned immediately.

Implementation of HACCP shall be monitored at all stages so as to ensure the quality and safety of the product. Time/ temperature controls shall be exercised at all stages of processing, storage and transportation of the

material. There should be a proper documented recall procedures incorporated in the HACCP Manual of the establishment.

d. Traceability of honey, permitted chemicals, etc. shall be maintained right from the source of production. The processor shall maintain test reports pertaining to the quality and safety of the raw material.

e. Establishments shall validate the processing method used for melting honey and calibrate all the recording devices at a laid down frequency appropriate to ensure proper temperature control.

f. A cleaning and disinfections programme should be implemented to ensure that all parts of the establishment are appropriately cleaned, including tables, utensils, equipments etc. The programme should be continuously and effectively monitored for its suitability and effectiveness and whenever necessary, documented.

g. Personal hygiene and behaviour of the employees shall be strictly monitored to ensure the safety of products handled. Health cards shall be maintained for all workers handling food products.

h. Proper control shall be exercised to avoid cross contamination of the product processed.

i. Suitable pest control measures shall be adopted to eradicate pests inside the factory premises.

j. Honey of other establishments should not be permitted to be stored in the approved premises of the establishment without prior permission from the EIA concerned. Moreover, honey processed in the approved establishment shall not be stored in other establishments without prior permission/approval from EIA

k. Approved establishments shall ensure that CFE blanks supplied *to* them are not misplaced or misused. They shall also ensure that the monitoring fees and other fees are paid to the EIA concerned and shall submit copies of CFEs used, on fortnightly basis.

l. Establishments shall test the raw material, water, finished products, etc. as per the laid down norms or have test reports arranged by suppliers, where necessary.

m. Establishments shall procure honey only from the identified bee keeping farms, for which they shall have sufficient control over them to ensure the wholesomeness of the honey.

n. Any change in the veterinarian(s)/ technologist(s)/ chemists shall be informed to the EIA concerned immediately.

o. Wherever, honey is used for processing, shall be fit for human consumption.

p. All equipments must be cleaned and disinfected before processing/packing honey.

q. Proper waste disposal system shall be developed to avoid possible cross contamination.

r. Training in personal and production hygiene shall be imparted to the employees on a laid down frequency.

8.2 Quality Control

Proper quality control measures/sampling plan shall be established by the processor, documented and implemented to ensure the wholesomeness of the products processed.

a) Primary Production:

The establishment shall exercise proper controls over the identified bee keeping farms/ collection centres/honey production holdings from which honey is being procured. The establishment shall conduct periodic audit for verification of requirements for GHP, Food safety, bee parasites, water, etc.as per **Annexure XXVIIC (Pg. 115-117).** The verification may also include testing of samples drawn from the farms, wherever applicable. **The establishments shall maintain traceability records for raw material procurement.**

b) Checks for physiochemical characteristics: Organoleptic checks and physiochemical characteristics as stated in Appendix of S.O.276 (E) dated 4th March 2002 of raw material, process and product samples may also be conducted by the approved technologist / qualified personnel to ascertain the freshness and wholesomeness qualities of the product.

c) Checks for residues of chemical contaminants

Approved establishments shall ensure that the identified bee keeping farms, from where the honey is being procured, is tested for prohibited pharmacological substances, environmental contaminants, etc. given at **Annexure ID (Pg. 57-58)**. The samples shall be tested by EIC approved lab if the internal facilities are inadequate.

The frequency of testing different parameters is given below:

- Pesticide residues - once in a month
- Carbamates & Pyrethroids - once in a month
- Chemical elements such as Heavy Metals & Antibacterial substances, including sulphonamides & quinolones - twice in a month

Above parameters shall be tested as per method given in the latest AOAC, codex/Internationally recognized methods

The establishment shall have Self Residue Monitoring Plan in place and addressed in HACCP.

Moreover, the consignments meant for export may also be tested for residual parameters as per the requirements of the importing country, whenever required.

d) Microbiological Checks

Sanitation and hygiene control samples

Sanitation and hygiene control samples from food contact surfaces and workers hand shall be tested for *TPC, Coliforms* and *Staphylococcus aureus* at least once in fifteen days to ascertain the effectiveness of cleaning and sanitisation.

e) Water

Establishments shall exercise proper quality control on water used in their factory. They shall check the microbiological parameters such as TPC and Coliforms in their in-house lab/EIA lab/EIC approved lab at least once in a fortnight.

Moreover, EU approved establishment shall test water used in the factory for all parameters as per EC Directive No.98/83/EC at least once in a year or whenever the source of water is changed. Water shall also be tested for parameters [Table-A (1) of EC Directive No.98/83/EC] as mentioned in **Annexure XVI (Pg. 109)** once in a year.

However, establishments approved for export to countries other than EU shall test water used in the factory as per IS 4251 on yearly basis except for radiological parameters.

8.3 Records

Proper records shall be maintained by the processor at all stages of production, storage and transportation of honey including primary production of honey (at bee keeping farms / collection centres/honey production holdings) and should be made available to the EIA/EIC officials for verification. The processor shall maintain the following basic records.

- **Traceability records pertaining to the raw honey, other food ingredients, chemicals, packing material, processing & final produce etc.**
- honey production monitoring records
- Raw material receiving and evaluation records.
- Temperature records of storage tanks/melting stage/moisture reducing stage/pasteurization etc.
- Quality control records.
- Consolidated daily production records

Packing records

- Microbiological / chemical test reports, physiochemical characteristics pertaining to honey, water, sanitary samples, etc.
- Packing/packaging material records

CCP monitoring records

- Corrective action and verification records

Cleaning and sanitation records

- Pest Control records
- Calibration records
- Infrastructure and equipment maintenance records

Training records

- Recall records

8.4 Marking of approval number on export packages.

Identification mark and details of the approved establishment shall be applied before the product leaves the establishment. However, a new mark need not

be applied to a product unless its packing and /or wrapping is removed or it is further processed in another establishment in which case the new mark must indicate the approval number of the establishment where these operations takes place.

The mark may be applied to the wrapping or the packaging, or printed on a label affixed to the package. The approval number along with the specified 'Q" Mark as given below, shall be printed/labelled on all the export packages of honey. The marks shall be legible and indelible, and the characters easily decipherable and must be clearly displayed for the competent authorities.

Approval No._____

In addition to the general requirements for identification marking, consignments of Honey, destined not for retail but for use as an ingredient in the manufacture of another product, must have a label giving the temperature at which the honey must be maintained and the period during which conservation may thus be assured.

However, export of honey without printing “Q” mark on the master cartons will be allowed in case where there is a specific request to that effect from the foreign buyer. In such cases, the exporter shall have to get prior permission from the EIA concerned after submitting relevant document(s). Even in such cases, the approval number of the processing establishment shall legibly printed/labelled on the cartons.

Note: Export package means the final package produced before the Customs in India and which is received and checked by the Customs at the importing end.

9. OFFICIAL CONTROL BY THE COMPETENT AUTHORITY

Strict confidentiality shall be maintained in all the official control visits and the establishments should not be given prior information about the visit. The visits shall be conducted unforeseen and unexpected. For proper official control, a three-tier surveillance system will be followed as per details given below:

9.1 Monitoring by EIA officials

9.1.1 EIA officials shall carry out periodic monitoring of the honey processing establishments to ensure that

i. All the approved facilities are being maintained by the establishment as per requirements

ii. All the regulatory requirements and those specified by the importing countries are being complied with and

iii. The products processed in the establishment conform to

specification.

9.1.2 An officer of the level of Assistant Director / Technical Officer, authorised by the controlling officer shall carry out monitoring.

9.1.3 The monitoring officials shall verify the own checks system adopted by the unit at all stages of production starting from raw material reception to final despatch of the consignment, for which it is essential that unit shall have production at the time of visits. If there is no production in the unit at the time of visit, the processing activity of the unit shall be assessed during subsequent visit.

9.1.4 ***Frequency of monitoring of honey processing establishments****:*

On initial approval of units, monitoring visits shall be carried out once in a month. If the performance of the unit is satisfactory for a year and in the absence of any foreign rejection/complaint, the frequency of monitoring shall be reduced to once in two months

After satisfactory performance for further one year on the basis of surveillance visits and in the absence of foreign rejection/complaint, the frequency of monitoring shall be reduced to once in three months.

When the units have not exported for at least for at least 6 months, the frequency of monitoring visits and supervisory visits by EIA shall be once in 6 months and once in a year respectively.

In case, at any stage, non-satisfactory performance on account of any major deficiency is observed during monitoring, the monitoring frequency shall be increased to once in a month. However, frequency of monitoring shall not be increased in case of contamination of products with chemical contaminants such as antibiotics, heavy metals or pesticides detected during surveillance visits or at the importing country. In such cases, the frequency of monitoring of bee production holdings shall be increased as decided by the In-charge of the Agency concerned. The performance of the unit, whose monitoring frequency has been increased to once in a month on account of non-satisfactory performance, shall be reviewed after **one year**. If the performance of the unit during one year is found satisfactory and if there is no foreign rejection/complaint during the period, the frequency of monitoring shall be reduced to once in two months. Further review of frequency of monitoring shall be done after a year as per the above procedure.

The responsibility for periodical review of performance of units and submission of recommendations to the in-charge of EIA shall be that of the controlling field office/ sub office of EIA. The Performa placed at **Annexure XVIID (Pg. 117)** shall be used for this purpose. The re-fixation of monitoring frequency shall be done by the in-charge of the Agency. Each EIA shall maintain office-wise records showing name, approval number and frequency of monitoring.

9.1.5 ***Areas of monitoring***

The monitoring shall broadly focus on: -

- *Facility checks*: to ensure that all the approved facilities are being maintained by the unit. This also includes verification of sanitary and hygienic conditions prevalent at all sections of the unit.
- ***Verification of traceability*: traceability records for raw material**

procurement and processing and final produce. This include the verification of records maintained by the unit to ensure that raw honey is procured only from the identified bee keeping farms/ collection centres/honey production holdings, the list of which had already been submitted by the unit. The monitoring official to verify through documentary evidence about the hygienic conditions, bee disease/parasites, use of veterinary medicinal products , if any, good veterinary practices (GVP)/ good farming practices, controls exercised by the unit over bee production holding etc. processing and final packaging of honey for despatch in the market.

- *Verification of compliance to the GHP and HACCP* to ensure that the unit has complied with the HACCP in to as envisaged in their HACCP manual and also controls exercised by the unit are adequate and effective. This includes verification of CCP monitoring, GMP, GHP, SOP, SSOP, traceability, good storage practices, raw material / process/ product controls, time/temperature controls, quality management of water, calibration and validation, etc.
- *Verification of testing and lab practices*: - to ensure that the sampling procedures and test methods adopted by the establishment are adequate and reliable. This includes good lab practices followed in in-house lab of the unit, effectiveness of lab chemicals, reliability of testing etc.
- *Verification of records*: - to ensure that the records maintained by the unit are in order and cover all the controls exercised by the unit.
- *Fraud control:* - to ensure that the unit is not violating the laid down norms. This includes violations with respect to export of honey processed in un-authorised places, storages of honey from other establishments without prior permission, misuse of CFE, improper labelling, exceeding capacity limits etc.
- *Drawl of official samples*: - to ensure the wholesomeness of the products and effectiveness of cleaning and sanitation. This includes drawl of sanitary samples, samples for testing microbial parameters, organoleptic checks etc. and residual parameters, whenever required.

Note. Detailed HACCP auditing may be done at least once in a year. However, all the other areas shall be covered during each monitoring visit, including verification of HACCP records and the own check systems adopted by the unit.

9.1.6 Additional Checks

The monitoring officials shall also check and record the following:

- Chlorination levels of water used for disinfecting feet, hands, and washing utensils/ equipment, etc., wherever applicable. It should be thoroughly rinsed with potable plain water after disinfecting. A general guideline for chlorination in the establishment is given below:

Hand disinfection	20 ppm.
Food Contact surfaces	100 - 200 ppm.
Floor, walls, etc.	100 - 200 ppm.
Foot dip	100ppm

Any other acceptable disinfectant / sanitizer may be used for the purpose and should be addressed in the HACCP.

9.1.7 Raw material checks

Monitoring officials shall conduct various quality checks on the available raw honey procured by the unit/establishment from identified bee keeping farms/ collection centres/honey production holdings for its freshness and wholesomeness. For this purpose, samples shall be selected from different sources of raw honey available at the time of the visit. Raw honey not meeting the standards shall not be allowed for further processing. The observations shall be recorded in the monitoring report and also in the honey procurement register maintained by the processor. It shall be ensured that only clean and fit for human consumption raw honey is accepted for further processing.

9.1.8 Microbiological/Chemical checks

The monitoring officials shall also draw samples for testing microbiological and chemical parameters, as per the details given below:

S. No.	Parameters	Products/ Stage	Frequency
1	TPC, Coliforms	Water	Every monitoring visit
2	TPC, Coliforms	Swabs from food contact surfaces	Every monitoring visit
3	TPC, Coliforms, S.aureus,	Swabs from worker's hand	Every monitoring visit

Note: In case of difficulties in testing samples at EIA laboratories due to storage/transportation of samples, the same may be tested at any EIC approved laboratories.

9.1.9 Sampling scale and sampling procedures

(i) Sanitary samples

Monitoring officials shall draw samples for checking the sanitary conditions and hygienic practices of the establishment as shown below:

(a)	Water used in the factory	1 sample of 1 ltr.
(b)	Swabs (1) Food contact surface (2) Workers hand	 1 sample 1 sample

The above swab samples shall be drawn either before start of the work or after normal cleaning if processing is in progress, adopting the following procedure:

(ii) Water

Water sample is collected from taps (Tap number to be mentioned in the sample covering notes*)* in sterile bottles /conical flasks of 1 litre capacity with ground flask stoppers having an overhanging rim. They are sterilised at 160^0C for 1 hour after being covered by Kraft paper. The opening and closing of the sterile bottle must be done with meticulous care to avoid any contamination. When water sample is drawn from a tap, flame the tip of the tap using spirit

and allow water to flow for 5 minutes before collection. In case the test is to be undertaken after 3 hours, the bottle must be kept in ice. If sample is to be taken from chlorinated water supply, it is important that any trace of chlorine should be neutralized immediately after collection. A crystal of sodium thiosuphate or 0.1 ml. of 2% solution of thiosuphate introduced into the sampling bottle prior to sterilisation serves neutralisation of chlorine. Immediately before testing, the water sample should be mixed by inverting the bottle several times. Thereafter some of the contents are poured off, the stopper is replaced and the bottle is shaken vigorously up and down.

(iii) Swab from worker's hand and food contact surfaces

Collection of Swabs:

25cm^2 area is swabbed using a square template of 5 cm x5 cms. The swab is moved through a distance 12.5 cms during the swabbing operation .A steel template of correct size, which can be readily sterilized by alcohol flaming can be used to outline the area.

First wipe the swab slowly and firmly in an interior direction through a distance of 12.5 cms. Rotate the swab against the direction of the overall wiping movement. Then stroke the area in the same direction three times, turning the swab slightly between strokes. Finally roll the swab once over the wiped area, but in the opposite direction from that in which the original strokes were made. This will serve to pick up whatever may be adhering to the surface. Place the swab immediately into bottle containing 100ml. of the diluents, in a wide mouthed 4oz. sample bottle. Pull the stick free if the swab in the medium is to be transported, hold it under the same condition as water samples are being transported i.e. hold it below 5^{0}C until analysed.

The sample colleted shall be transported to the laboratory in the usual manner under sealed condition and accompanied by covering note containing details of tests to be carried out.

(iv) Maximum Permissible limits

S.No	Samples	TPC at 37^{O}C	Coliforms	S. aureus
1.	Water	20 per ml**	Absent in 100 ml (MPN)	--
2.	Food contact surfaces	100 per cm^2	Absent / cm^2	--
3.	Worker's Hand	100 per cm^2	Absent / cm^2	Absent / cm^2

Note ** for establishments approved only for non-EU, the limit of TPC in water is 50 per ml.

(v) Physicochemical testing: For physicochemical characteristics sampling and testing may be carried out as per codex standard for honey CODEX STAN 12-1981.

(vi) Proficiency testing of the in-house laboratory of the processing establishments.

In order to ascertain the proficiency of the in-house lab of the establishment, the monitoring officials shall draw aseptically 2 sets of samples (one sample divided into 2 sets) from the selected production batch during the monitoring at least once in a year. One set of sample is sent to EIA Lab and the other set is sent to the in-house lab of the establishment for testing all microbiological parameters specified at Cl. 9.1.8. No fee will be charged from the processor for this purpose.

The test results shall be compared by the EIA and if variation more than 10% is observed, same will be communicated to the unit for corrective action and subsequent verification and sampling

(vii) Analysis for chemical contaminants

Samples for analysing chemical contaminants shall be drawn as per Residue Monitoring Plan (RMP) of EIC, whenever applicable.

(viii) Sampling scale for finished products:

The number of packages selected for preparing composite laboratory sample shall be (√n+1)/2; where n= total number of packages in a batch / lot / consignment.

Note: If the fractional number is less than 0.5, it should be rounded off to the lower digit and if it is 0.5 and above, the same shall be rounded off to the higher digit

9.1.10 Reporting system

After completing the monitoring, the report shall be prepared in the Monitoring Report Pro-forma (**Annexure XVII) (Pg. 110-112)**. The reports shall be submitted to the controlling office of EIA within three working days of the visit along with Non Conformity Report (NCR) as per **Annexure XVIIA (Pg. 113)** and Suggestions for Improvement (**Annexure XVIIB) (Pg.114)**, if any.

Similarly, the report for bee keeping farm/ collection centres/honey production holding shall be enclosed in the Farm Visit Report Pro-forma (**Annexure XVIIC) (Pg. 115-116).**

Sub Office shall send a copy of Monitoring Report, test report, NCR and Suggestion Report to HO on monthly basis for all the establishments. In case of failure of the samples, it shall be intimated to the processor. Test reports can also be given to the processor if specific requests have been made for the same.

Formats of Non Conformity Report (NCR) and Suggestion Report are placed at **Annexure XVIIA (Pg. 113)** and **Annexure XVIIB (Pg.114)** respectively. This format shall be used during monitoring visits/supervisory visits as well as in other surveillance visits.

Non-conformities observed during the surveillance visits shall be recorded in the NCR and shall be provided to the establishment for taking corrective action/rectification of deficiencies within an agreed time period, which is determined, based on gravity of the deficiencies. The monitoring official shall also mention in the NCR, the earlier deficiencies which are not rectified by the unit. The monitoring report along with the copy of NCR shall be submitted to the controlling officer of the sub-office or to the Deputy Director (In-charge) of Food Division/Scheme within three working days for scrutiny, acceptance and follow up action.

In case of sub-office, copy of the Monitoring Visit Reports along with relevant laboratory analysis reports shall be sent to EIA-HO for records.

9.2 Supervisory visit

Supervisory visit shall be carried out by an officer of the level of Deputy Director and above from the Agency concerned having adequate experience in operation of Food Scheme. The frequency of supervisory visits shall be once in six months.

The Supervisory visit shall be conducted for

1. checking the documentation and compliance of the requirements of the EC Directives in case of EU approved units and GOI Notifications,
2. Performance of the monitoring visits carried out by the monitoring officers.
3. performance of the tasks carried out by the approved veterinarian(s)

Samples if any, drawn during such visits shall be sent to the laboratories of Agency concerned. Test report shall be made available within one week. The report of supervisory visit shall be submitted within three working days to the In-charge of the Agency concerned.

In addition, the availability of water test reports from EIA laboratory or EIC approved laboratory for complete testing as applicable shall be checked

The pro-forma of Supervisory Visit Report is given at **Annexure XVIII (Pg. 118)**

A copy of each Supervisory Visit Report shall be maintained in the files of Export Inspection Agency HO as well as controlling sub-office.

9.3 Corporate Audit

Audit of each Agency will be carried out at the frequency of at least once in a year. The main objective of the corporate audit is to ensure uniform implementation of the rules and regulations issued by the Competent Authority and shall comprise:-

- Examination of records of processor maintained by the Agency like reports of visits, lab reports, approval/renewal of approval etc.

- Visit by the audit team to at least 10% of the approved establishments, subject to a minimum of one.

- The audit team shall comprise of at least two officers from the other Agency(ies) and/or EIC, of the level of Deputy Director having adequate experience in operation of Food Scheme or in unavoidable circumstances, senior Assistant Director having adequate experience in operation of specific Food Scheme, as nominated by Director (I&QC). If required, experts from outside can also be included in the corporate audit team. The report of audit shall be submitted to Director (I&QC) as per format specified at **Annexure XIX (Pg. 119).**

10 GUIDELINES FOR DEALING WITH UNSATISFACTORY MONITORING OR OTHER VISIT REPORTS AND / OR TEST REPORTS AND VIOLATIONS

10.1 Deficiencies.

a) The deficiencies, which do not affect the wholesomeness (food safety) of the products, shall be considered as minor deficiencies and those which

affect the safety of the food product shall be considered as major deficiencies.

b) A number of minor deficiencies or repeated minor deficiencies indicating a system failure would also be treated as major deficiency.

Some of the other Major deficiencies are as follows:
**Contamination with hazardous substances like heavy metals, antibiotics, pesticide residues etc. above permissible limits shall be considered as major deficiency.*
**Failure of sanitary samples for TPC, Coliforms or S. aureus in three consecutive instances may be considered as major deficiency*

10.2 Actions to be taken in case of deficiencies observed

10.2.1 In case of minor deficiencies observed during the visit, the non-conformities shall be communicated to the processor through the NCR and EIA officer shall verify the corrective actions taken by the processor, during the subsequent visit. However, if the processor fails to rectify the defects within the agreed time period, then the action specified at 10.2.2 shall be followed.

10.2.2 In case of major deficiencies observed during the visits, the explanation of the processor may be called with time frame for rectification. Further, any one or more of the following actions may be taken depending on the nature of deficiencies, with approval of the Director, EIC.

(i) The processor may be placed under consignment-wise inspection until the rectification is carried out and verified to EIAs satisfaction by an on-site visit by Deputy Director level officer.

In case of failure on account of chemical contaminants, the approved processor shall suspend procurement of raw honey from the specific source immediately until the appropriate corrective action has been taken by the bee keeping farm/ collection centres/honey production holding(s). Subsequently, the samples of raw honey drawn from the specific source shall be tested for the specific contaminant(s), the cost of which shall be borne by the processor as per clause No. 18.

(ii) The processor may be advised to suspend production and export until rectification is carried out and verified by an on-site visit by Deputy Director level Officer. However, during the suspension period production may be permitted if requested by the processor, in un-avoidable circumstances with the approval of the Competent Authority under the supervision of an EIA Officer for which fee applicable for deputation of an officer has to be paid by the processor as per clause 18, to the EIA concerned.

- Revocation of suspension, if required as per (ii) above, shall be done with due approval of Director (I &QC).

10.3 Action against violations

In case of violations, such as (i) misuse of Certificates for Export (CFE) (ii) Storing of honey at un-authorised premises (iii) Non-payment of monitoring fee (iv) processing of honey in unauthorised establishments (v) major failure in meeting GMP/GHP/HACCP etc., have been detected, the following penalties shall be imposed on the defaulting unit by the Competent Authority

with due approval of the Director (I&QC).

(a) A show - cause notice shall be issued by the EIA to the unit, for which the unit has to submit a reply within one week along with a statement of stock declared as on date. Meanwhile, the Competent Authority would suspend the Export production of the honey in the establishment from the date of the issuance of the letter. No production is allowed during that period. However, stock in hand may be allowed to be exported in special cases after due consideration with the written permission of the C.A.

(b) If the same violation is observed for a second time in the same unit, the unit would be suspended from production and exports for a period of three months.

(c) If the same violation is reported for a third time or more than two malpractices reported in a period of six months, Competent Authority may withdraw the approval granted to the unit.

(d) When the show cause notice is issued by the EIA, processor may contact the competent authority, if he/she wishes so, to explain his/her side.

11. ACTION TO BE TAKEN IN CASE FAILURE OF SAMPLES DRAWN DURING RMP

When the samples drawn for Residue Monitoring Plan (RMP) fails to meet the requirements, EIA shall take appropriate action as specified in the RMP.

12. PROCEDURES TO BE FOLLOWED WHEN AN APPROVED PROCESSING ESTABLISHMENT TEMPORARILY SUSPENDS ITS PRODUCTION

When an approved establishment decides to suspend its processing activities temporarily for a period exceeding thirty days for reasons such as:

(i) General repairs/routine maintenance

(ii) Improving their hygienic and sanitary conditions

(iii) Identifying the cause of contamination and taking corrective action to prevent recurrence

(iv) Major alteration/construction work etc.

(v) Any other activities, which may result in change in production flow or give scope for contamination of honey etc.

③ The processor shall intimate the local office of the EIA, the date from which it intends to suspend its operation, the purpose and the probable date by which it intends to resume its production activity.

③ Upon receipt of intimation, EIA may discontinue monitoring visit/Supervisory Visit to the establishment. The processor shall not commence production without prior permission from EIA.

③ When the establishment is ready to resume production, the processor shall request EIA concerned for permission to commence production. Before granting permission to start production, the EIA concerned shall take following actions:

For (i), (ii) and (iii) the establishment shall be assessed by the monitoring officer to ensure satisfactory conditions after carrying out the changes.

For (iv) and (v) the establishment shall be assessed by a team of EIA officers or by an IDP as decided by In-charge of the EIA to ensure satisfactory conditions.

Note: During monitoring visits if it is observed that the unit is not having production for the past one month, the unit shall be allowed to start production only after the satisfactory on-site assessment by the monitoring official(s) deputed by the In-charge of the Agency

13. INFORMATION AND RECORD

Further, updated information shall be maintained by each Sub Office and HO of every EIA. The monthly statements of updated information shall be sent by each Sub Office to the Head Office of Agency concerned on every first working day of the following month, in the required formats, for compiling and updating information for the Agency, for further submission to EIC as and when required.

14. REPORTING TO EIC

Each Sub Office shall send the monthly reports to the Head Office of Agency concerned by first working day of the following month and the Agency shall compile the following information in the required format for submission to EIC as per the time frame given at clause 15.

- Details of monitoring and supervisory visits planned and carried out as per **Annexure XXIII (Pg. 128).**
- Change in the list of approved honey establishments as per **Annexure XXIV (Pg. 129)**
- Details of monitoring samples failed as per **Annexure XXV (Pg. 130).**
- Status of the establishment having foreign rejections as per **Annexure XXVI (Pg. 131).**

15. TIME FRAMES: Time frames prescribed for various activities shall be as under:

* Submission of reports of monitoring and supervisory visits	Three working days	
* Testing of monitoring samples in EIA Laboratories	1 week	
* Submission of monthly reports to EIC	by 7th of succeeding month	
* Closure of complaints	*From foreign buyers*	Maximum of 3 months or time taken to offer 10 consignments for inspection, whichever is earlier.
	In case of rejection consignments	After testing of returned consignments.

16 PROCEDURE FOR CONSIGNMENT WISE INSPECTION

16.1 Application for inspection

16.1.1 The exporter seeking approval shall submit their application for inspection in the prescribed format given at **Annex**- **XXVII (Pg. 132)** in triplicate to the concerned EIA in their region.

16.1.2 Application shall be accompanied with a copy of the technical specification and of export contract blanking out pricing and other details.

16.1.3 The application shall be accompanied with inspection fee as applicable in the form of demand draft/cheque drawn in favour of EIA concerned.

16.1.4 The application shall be given not less than the two days before the inspection is to be carried out if the premises is situated at the same station as office of EIA; and not less than 5 days before the **inspection** is to be carried out for premises which are not situated at the same station, where the EIA is concerned.

16.2 **Inspection**

16.2.1 The inspection shall be carried out by the concerned EIA either at the port of shipment or at the premises of the packer or any other premises, which may be registered with any regulatory authority, where the consignment is offered by the exporter subjected to adequate facilities for the inspection including drawing, preparation and sealing of the samples being provided by the exporter.

16.2.2 In addition to this, the agency shall have the right to reassess the quality of the consignment at any place of storage, in transit or at the port before the actual shipment.

16.3 Sampling

16.3.1 For the purpose of testing of consignment with reference to the standard specifications laid down in the Notification, sample in duplicate shall be drawn from each lot offered for inspection by the designated EIA official based on sampling procedure given at **Annexure-XXVIII (Pg. 133- 134)**.

16.3.2 The samples drawn shall be sealed in presence of exporter so as that unauthorised opening is detectable. Both samples shall be given an identification pack carrying the following information:

- Date of sampling
- Lot size with batch number
- Sample weight
- Name and designation of the sampling officer

16.3.3 One sample shall be given to the exporter, while the second sample shall be sent to EIA laboratory for testing as per the specifications prescribed. The exporter's sample will be analyzed only in case of dispute.

16.4 Testing

16.4.1 Lab sample shall be brought by EIA official and handed over to EIA lab./ EIC approved lab or sent by courier with due acknowledgement in case the inspection is done by EIA sub-office but shall in no case be left with the exporter.

16.4.2 Lab samples shall be tested for all parameters prescribed in the schedule of notification/contractual/international specification as per the method of analysis referred in Codex Alimentarius Commission/AOAC.

16.4.3 The test report of the lab sample shall be furnished as per the prescribed format given at **Annex-XXXI (Pg. 137)** within seven days of sampling.

16.4.4 Testing charges will be borne by processor/exporter on actual basis.

16.5 Certificate of Inspection

16.5.1 In case the sample conforms to the prescribed specifications, the EIA shall issue certificate of inspection as per the format prescribed at **Annex-XXIX (Pg. 135)**. The certificate of inspection will be valid for a period of one month from the date the date test report issued.

16.5.2 If the sample drawn is found not conforming to the prescribed specification, the consignment will be rejected for export and the rejection report will be issued as per the prescribed format given at **Annex-XXX (Pg. 136).**

17 EXPORT CERTIFICATION

17.1 Certificate for Export (CFE)

17.1.1 ***Procedure***

Since all the consignments of honey meant for export should undergo quality control and inspection prior to shipment and should be accompanied by a Certificate for Export (CFE) as per the format given at **Annexure XXI (Pg. 125)**, the approved processing units shall issue a Certificate for Export (validity for which shall be **forty five** days from the date of issue) for every export consignment.

Certificate blanks shall be obtained from the EIA concerned by payment of charges as per clause 18. Each set of certificate blank will consist of original (in white) intended for Indian Customs; duplicate (in pink) to be forwarded to the local office of EIA and the last two copies (in green and blue) for the use of the processing unit. EIAs shall maintain proper records of issuance of blank CFEs and their utilisation by the establishments.

The responsibility for the maintenance and proper utilisation of the CFEs issued to them lies with the approved establishment. They shall issue CFEs only for honey that is processed in their approved establishment and have undergone all the quality checks/ tests specified. The establishment is liable for penal action for the misuse of CFEs issued to them.

Only persons authorised by the establishment shall be allowed to sign the CFEs and the list of persons authorised to sign CFEs shall be made available to the EIA.

If the validity of CFE is expired, then the same can be revalidated up to another thirty days and the monitoring fee will not be charged again, if there is no upward revision in FOB value. However no refund will be given in case of downward revision in FOB value.

In case of cancellation or damage of CFE, the establishment has to submit the original of the cancelled CFE to EIA, with other three copies (full set) and original Health Certificate (HC) (if already issued) pertaining to the CFE.

17.1 .2 *Issuance of Certificate for Export*

17.1.2.1 Books of CFE blanks shall be issued on request from the approved processing establishment only after the approval of DD In-charge of the scheme/ officer in-charge and after the previous CFEs issued have been accounted for and paid for. However exporters may have up to 5 sets remaining so as not to cause any operational problems.

17.1.2.2 Every approved processing unit must have a Pass Book account system operating with the controlling office of EIA. The processor shall ensure that adequate balance is always maintained in their deposit account with EIA for the payment of monitoring fee and other certification fee. No CFE blanks shall be issued unless there is adequate balance in their account.

17.1.2.3 In case of lost certificates, exporter shall submit an indemnity bond to that effect to the EIA concerned as per the format given at **Annexure-XXII (Pg, 126)**. EIA, in turn, shall inform the Customs to check that those numbers have not been presented to them. Further, Customs shall be informed not to accept those specific certificates in future.

17.1.3 *Statement of Certificates for Export issued*

17.1.3.1 Every approved establishment shall submit periodic statement of Certificate for Export issued, ***enclosing the pink copy*** of CFE on **fortnightly basis** for the export of honey along with honey imported from other countries, in the pro-forma given at **Annexure XXIA (Pg. 126)**. Nil statement shall be submitted in case of no exports during the period. Based on the statement submitted by the approved establishments, local EIA office shall debit monitoring fee from the deposit account of the establishment as per clause 18.

17.1.3.2 The pink copy of every CFE issued along with the related production batch details, product/variety wise packing list and invoice copy shall be attached to the statement. In case, the pink copy of the CFE has already been submitted to EIA for obtaining Health Certificate or any other purpose, this may be indicated in the remarks column.

17.1.3.3 If the approved establishments are not submitting the statements even after fifteen days, no further CFE blanks shall be issued to them. Moreover, a show-cause notice may be issued to the establishment as to why the production and export may not be suspended by the Competent Authority.

17.2 Health Certificate Issuance

17.2.1 *General*

All consignment of Indian honey exported to the EU are required to be accompanied by a numbered original health certificate, in accordance with the model **Annexure XXA (Pg. 120-121)** duly completed, signed and dated. The model health certificate meant for the Non-EU approved establishments is placed at **Annexure XXB (Pg. 122).** Health Certificate should be issued before or on the day of shipment and cannot be issued retrospectively.

Note:

1. If Health Certificate is lost in transit or otherwise, the establishment may request for issuance of a duplicate health certificate by submitting an

indemnity bond (Annexure XXII) (Pg. 127) in a non judicial stamp paper stating clearly that if found later, the same will not be reused for any further export but shall be surrendered to EIA for further action. Under such circumstances a duplicate health certificate may be issued in lieu of the lost health certificate and the establishment shall pay charges as per Clause No.18.

2. The EIA may issue corrigendum or addendum or clarification to the health certificate already issued after examination of the request from the approved establishment for the purpose of ascertaining its genuineness. In such cases, prescribed fee for issuance of corrigendum or addendum or clarification shall be charged as per clause 18.

17.2.2 ***Procedure:***

(i) The Health Certificate shall be issued only for honey processed in establishments, approved and monitored by the EIA.

The processor/exporter shall request for health certificate from the controlling office of EIA with the following:

a. Application in the prescribed format as per **Annexure XXD (Pg. 124)** giving all necessary information

b. Authorisation to EIA to debit fee as per Clause No.18, as applicable, from its deposit account at EIA

c. The pink copy of the Certificate for Export issued by the approved establishment.

d. Invoice copy

e. Declaration pertaining to the details to be mentioned in the health certificate including the product is produced as per the requirement, meets specifications of the importing country and is fit for human consumption.

f. Certificate of analysis.(for residues, drugs and heavy metals for the period of production of the consignment and the additional parameters to be indicated in the health certificate clearly indicating about compliance of the consignment as per the requirement of importing country. Certificate of analysis should be from EIC approved lab if in-house testing facilities are inadequate)

(ii) In case certificate is required in foreign language other than English additional charges will be levied as per Clause No. 18.

(iii) The controlling local office of the EIA responsible for monitoring the units shall issue health certificate to the processor/exporter after satisfying itself that the honey processed in approved establishments having valid approval number and after satisfying the relevant requirements.

(iv) Health certificate shall be prepared in duplicate, the original for the exporter for forwarding to the importer, other copy for record of local EIA. Statement of health certificates issued shall be sent to Head Office on monthly basis.

(v) The certificate shall consist of single page printed on both sides and where additional pages are attached; all the pages should form the part of certificate and cannot be separated.

(vi) Where additional pages are attached to the certificate, the signature and stamp of the certifying official shall appear on each page and each page shall be numbered ' x- (page number) of y (total number of pages)' on the bottom and shall bear the Certificate reference number of the certificate allotted by the Competent authority on the top.

(vii) Each health certificate shall bear the name, designation and signature of the representative of EIA and the official stamp of EIC in a colour different from that of other endorsements. While issuing health certificate, the issuing officer must ensure that the colour of the signature is different from the colour of the printing of certificate. Since the certificate is usually printed in black, the signature must not be in black colour. The signature shall be in blue or red colour on the original of the certificate. The copies of the certificate shall have the carbon impression of the signature. The colour of the stamp shall also be different from that of the printing.

(viii) Reference number of health certificate:

Since no two certificates issued from India should have the same number, the given below system shall be followed for giving the reference number:

Each Sub-office shall give serial number for each health certificate issued prefixed by Agency/Sub-Office codes.

For Example:

Sub-Office:

EIA-Chennai, SO: Hyderabad	Honey/CH/HY
EIA-Kochi, SO: Bangalore	Honey/CN/BL

As an example, the certificate issued by Sub-office: Bangalore will have a reference number: Honey/CN/BL/1, Honey/CN/BL/2…

(ix) Annexes, if any, such as results of analysis shall have the same reference number as that of the health certificate.

(xi) The health certificate shall be valid for 10 days from the date of issue, unless otherwise stated. However, the term of validity shall be extended by the time taken by the voyage for transport by ship, as declared by the processor/exporter. **(Can be changed)**

18. FEE STRUCTURE

The prescribed fee shall be paid in the form of Demand draft / bankers cheque in favour of Export Inspection Agency concerned or through the deposit account held at the Export Inspection Agency concerned as applicable.

~~S. No.~~	~~**Activity**~~	~~**Fee (in Rs.)**~~
1.	Application for approval / renewal of approval of establishment	Rs 2000/- towards application fee and Rs.3000/- towards other charges including adequacy audit.

2.	Application for approval of additional activity / facility	Rs.5000/-
3.	Application for approval / renewal of approval of veterinarian/ technologist	Rs.2000/-
4.	Monitoring fee	@ 0.2% of FOB value with a maximum of Rs. 15 Lakhs per annum per exporter or processor
5.	Countersigning of Certificate for Export (CFE) for Merchant Exporter	Rs.100/- as Service Charge
6.	Consignment-wise Inspection on account of official control	@ 0.4% of the FOB value of exports subject to a minimum of Rs. 500/- per consignment
7.	Testing Charges	Testing charges to be borne by processor/exporter on actual basis (as per clause , 10.2.2 (ii), 16.4.4 and in other cases)
8.	Issue of Health Certificate	Rs.100/-
9.	Issuance of corrigendum or addendum or clarification to Health Certificate	Rs.100/-
10.	Issuance of Health Certificate in Foreign Language other than English	Rs.100/- + other actual expenses
11.	Verification of corrective actions/measures taken by the establishment on account of complaints or major deficiencies	Rs.2000/- per man-day
12	Deputation of an officer to verify reprocessing /rectification of deficiencies on account of complaints or major deficiencies	Rs.2000/- per man-day
13	Visit for additional monitoring / drawing samples for testing on account of complaint for importing countries	Rs.2000/- per man-day + Testing charges
14	Drawing samples at the request of the processor	Rs.2000/- per man-day
15	Certificate for Export (CFE) blanks	Rs.20/- per set
16	Permission to process & pack honey for export by merchant exporter	Rs. 2000/- per merchant exporter

19. PROCEDURE TO BE FOLLOWED FOR COMPLAINTS RECEIVED FROM IMPORTING COUNTRIES

19.1 General

When a complaint is received from the importing country or a consignment of honey is detained or specific control measures are imposed by the importing countries on food safety grounds such as product contamination with residues (antibiotic, pesticides, etc.) or any complaint due to failure in quality parameters or other than quality parameters like labelling, packaging etc the following procedure shall be adopted in order to prevent recurrence and deal with the rejected consignment.

19.2 In case of receipt of information directly by the exporter regarding rejection of the cargo by overseas health authorities in any importing country, the exporter shall inform the EIA concerned immediately with a copy to Export Inspection Council of India (in case of Merchant exporter, a copy of the communication will also be sent to the manufacturer/ processor).

In case of receipt of complaint at EIC it shall immediately be referred to the EIA concerned. EIC may simultaneously seek complete details from the complainant.

19.3 The processing unit shall immediately be placed 'on alert' by the EIA concerned, in case of food safety complaint, which will mean

- Frequency of monitoring visit shall be increased to two visits/month.
- In case the situation is due to in-process contamination such as permitted pharmacological substances, other permitted substances (such as Phosphates, etc.), etc. above the permissible level, or the situation is due to environmental contamination such as, PCB, dioxin, pesticides, etc. or use of prohibited pharmacological substances (Chloramphenicol, Nitrofurans, etc.), etc. ten consecutive consignments shall be subjected to consignment-wise testing for the specific contaminant. For this purpose samples are drawn from all the batches of the consignment to make a composite sample. In case of rejection due to failure in quality parameters, next ten consignments are inspected for organoleptic factors, chemical factors. The inspected consignments shall be allowed for export to EU or Non-EU, only after satisfactory test results of the EIA-laboratory or EIC approved laboratory for the specific parameter(s). However, if the consignment fails for any of the parameters tested, the consignment may be re-tested batch wise on request from the exporter/ manufacturer and only those batches, conforming to the specification for specific parameter(s) shall be allowed for export.
- The increased monitoring frequency shall be discontinued at a stage where the four consecutive monitoring visit reports and test reports are satisfactory.

Note : Charges as per clause No. 18 shall be paid by the processor for the every additional visit for monitoring/sampling for re-testing, if any. Cost of testing and retesting, if any, of ten consecutive consignments, shall also be borne by the processor.

19.4 EIA shall seek complete information in detail about the consignment in question from the processor as given below:

a) Full particulars of the consignment such as product name, quantity, batch no./grade list along with attested copies of related documents such as purchase order/ letter of credit, certificate for export, health certificate, bill of lading, test reports etc. and also source of raw materials used for processing and export details. (Details regarding prices need not be furnished by the exporter/processor).

b) Details of whereabouts of the consignment.

c) The particulars of honey held in stock.

d) If the processor has got the consignment in question, analysed independently or surveyed by an independent surveyor, in the country where it was detained, the copies of such test/survey reports shall be made available to the competent authority for examination.

e) Corrective action(s) proposed/taken by the processor to prevent recurrence of the problem.

19.5 EIA shall immediately arrange a visit by a panel of experts (within a week) to the processing unit for

- Collection of information as required in **19.4** above, if the same has not been furnished in time.
- Assessment of the processing establishment to determine the cause of specific contamination.

  Assessment of the processing establishment shall be carried out by a team of two senior officers from EIA. During the assessment the following shall be checked:

  a) The implementation of HACCP with respect to the specific contaminant/ contamination.

  b) The Controls to prevent specific contamination in the product and appropriate laboratory analysis for the verification of the same.

  c) The Corrective action(s) proposed/taken.

  In addition, appropriate samples of swabs for sanitation and Hygiene control; raw material, water, feed, in-process product, finished product, etc., as applicable for cause of contamination may be drawn and tested in EIA laboratory /EIC approved laboratory.

  Note: *During assessment, it may be necessary to assess GMP and personal hygiene with specific reference to the cause of rejection. It may not be necessary to have a fresh assessment related to infrastructure facilities and other aspects of HACCP. Sanitation and hygiene control samples, additives etc. need only to be tested in relation to the specific cause of rejection.*

19.6 Based on the assessment, the team shall prepare a detailed report and submit to the Head Office of the EIA. This report shall contain the following information as appropriate and applicable to the specific contamination:

a) Details of checks/controls for the specific pathogen/contaminant on raw materials from different sources and subsequent followup action planned and carried out by the processor.

b) Disinfection methods, which are normally carried out in the unit to sanitise equipment/tools used in processing and in handling raw material following GMP.

c) Systems established in the unit to *ensure* hygienic conditions in various phases of processing honey.

d) Periodic checks and other controls effected by the unit after the knowledge of product contamination with scope to guarantee the hygienic condition.

e) Adequacy or otherwise of the checks, laboratory testing and other controls on raw materials, in-process products and finished products. Whether disinfectant level of water for various activities are properly maintained, checked at regular intervals and records are maintained. Whether the unit has conducted testing of water at the laid down frequency and records are maintained.

f) Whether or not the processing establishment is capable of producing safe, wholesome honey.

g) Whether HACCP plan is adequate and HACCP-based procedures are in place as per plan

h) Findings on the possible reasons for complaint.

The Head office of EIA shall communicate the deficiencies, if any, observed during the assessment, to the processor in writing for remedial action.

19.7 In case of complaint other than quality, it shall be dealt as per **10.3** above.

19.8 Dealing with returned consignments

19.8.1 If the consignment has been brought back to India, the processor shall inform the details of the storage of the consignment to the EIA concerned, which in turn shall be informed to EIC.

19.8.2 On receiving the above intimation the following actions shall be taken:

(a) The local office of EIA shall arrange to get the consignment inspected/tested for factors, as applicable. One composite sample each from every production batch shall be tested for the specific contaminant at two different laboratories. For this purpose, testing shall be done at EIA Laboratory or EIC approved laboratory. The results shall be communicated to the Agency Head Office. The charges for visit and testing shall be payable by the processor as per clause 18.

(b) If all the samples tested from the brought back consignment show negative results for the specific contaminant(s), the In-charge of EIA concerned may take decision to release the consignment for export to the country other than the country/ union of countries where the consignment had been rejected.

Note: Export Inspection Council where considered necessary may inform results to MoC&I as well as EC/importing country.

(c) If any of the samples tested from the consignment brought back on account of food safety complaint shows positive results, the processor

shall dispose of (reprocess or destroy) the consignment in a manner acceptable to In-charge of EIA concerned.

(d) The schedule of reprocessing shall be furnished to the local Office of EIA by the processor for arranging supervision of reprocessing.

(e) The processor shall offer the reprocessed consignment for inspection by EIA.

(f) EIA shall inspect the reprocessed products batch-wise for all parameters as per the sampling plan as given at clause No. 9.1.9 (viii).

(g) The fee for EIA supervision with regard to reprocessing shall be as per clause 18, in addition to the charges towards consignment-wise inspection Testing fee shall be borne by the processor.

Note: *Reprocessing is not applicable in case of rejection due to residues of prohibited substances, environmental contamination, etc.*

(h) If the reprocessed products are found export worthy on inspection, the lots/batches shall be allowed for export to countries other than the country or union of countries where it had been detained prior to its reprocessing.

Note*: In the case of a sample from the returned consignment testing positive for residues, the batches testing positive will not be permitted for exports.*

19.9 If the following points are satisfactory:

a) The consignment if brought back, on account of the complaint and tested for the contaminant is found free of the contamination/ defects as evidenced by the test reports/ organoleptic reports.

b) The assessment report indicates that the processing establishment has been maintaining proper hygienic conditions and implementing HACCP.

c) The periodical monitoring conducted by EIA during the past three months indicates satisfactory hygienic conditions in the unit.

d) Samples drawn during the assessment visit conforms to the requirements.

EIA shall put up the case with relevant papers/reports to the Director (I&QC) with a recommendation for taking up the matter with the foreign health authority for revoking their specific control measures/rapid alert, as the case may be. EIC may make the necessary recommendation to the foreign health authority through half yearly dossiers.

The EIA concerned shall reduce the number of monitoring visits to once in a month, provided at least four fortnightly monitoring visits have been carried out since 'On alert' was imposed. It may be noted that the unit shall continue to be 'On alert' even if recommendation to foreign health authority as above is made, if any, and revocation of 'On alert' would be considered only after ten consecutive consignments have passed and monitoring/supervisory visits during the period are satisfactory. The 'On alert' imposed on the unit shall be revoked only after the approval of the Director (I&QC).

19.9.1 However, if any of the above points are unsatisfactory, i.e.

(i) The consignment, if brought back, is on testing found to be contaminated /defective

(ii) The assessment report indicates unsatisfactory hygienic conditions in the unit;

(iii) Samples drawn during assessment visit fail;

(a) Production and export to all countries shall be stopped till causes of contamination are properly identified and appropriate corrective actions are taken to prevent recurrence.

(b) Processor to show cause within ten days why the approval granted to the establishment may not be withdrawn in the light of the complaint and the findings.

19.9.2 Once the processor informs the EIA that corrective actions have been carried out, verification, of the corrective actions, shall be carried out by the EIA. The processor may be allowed to resume production for export only after satisfactory on-site verification of the rectifications of the deficiencies and approval of the Director (I&QC).

19.9.3 If the Competent Authority is not satisfied with the reply of the processor as above, or with the corrective action taken and verified as above, the approval granted to the establishment may be withdrawn.

19.9.4 After resumption of production, an officer, not below the rank of Technical Officer shall be deputed to such units for a minimum period of ten days extendable up to thirty days for continuous monitoring of the enforcement of various standards relating to the quality control, food hygiene and food safety. The cost of such deputation of EIA officers shall be charged to the units as per clause No. 18 (if working is more than one shift, all shifts should be covered at random).

Note: *Superintendence as described above will be waived off in case of rejections due to residues, if the unit can prove that the rejection is not due to a cause identified in the processing unit.*

19.9.5 After resumption of production, the next ten consecutive consignments shall be inspected by the EIA concerned. The consignment wise inspection shall be carried out till such time the ten consecutive consignments are cleared satisfactorily. The Cost of testing shall be borne by the processor. Based on the satisfactory test results, EIA shall allow the consignment produced by the establishment for export. The samples shall be drawn as per the sampling scale as per clause No. 9.1.9(viii).

19.9.6 The unit shall be taken off from the "ON ALERT" list only after monitoring as per 19.9.3 and testing of consignments are found satisfactory.

Note: In specific cases, if decided by the Competent Authority, there may be deviation in the above procedure.

20 Appeal

20.1 Any person aggrieved by:

Decision of the 'Competent Authority' not to issue certificate of inspection to the establishments as per rule 7 Notification No. S.O. 277 (E) dated 04.03.2002; may prefer an appeal within ten days of receipt of such communication to an appellate authority appointed from time to time by the

Central Government.

20.2 The appeal may be sent to EIC for forwarding the same to the Chairman, Appellate Authority '

a) At least two-thirds of the total membership of the Appellate Authority shall consist of non-officials.

b) The quorum for any meeting of the Appellate Authority shall be two in case panel consist of three and three in case panel consist of four or more members.

c) The appeal shall be disposed off within thirty days of its receipt.

d) The non-official members would be eligible for TA/DA as admissible to them from time to time for attending the meetings of the Appellate Authority. The expenditure on this account will be borne by the Export Inspection Council.

e) Appellate Authority consists of the panel of experts consisting of not less than three, but not more than seven persons appointed by the Central Government.

21. POWER TO RELAX

In case any situation arises, which is not covered by the executive instructions, EIAs may make a suitable recommendation to EIC for decision by Director (I&QC).

*

Annexure I

APPLICATION FOR APPROVAL
(Honey Processing Establishments)

From

To

Export Inspection Agency-_____

Sir,

Please carry out the assessment of our establishment as required under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002 for approval to process honey for export to all countries including European Union/Non-EU countries.

We furnish below the information regarding the facilities existing in our establishment, and primary collection centres.

We undertake that our establishment meets the requirements stipulated in Export of honey (Quality Control, Inspection and Monitoring) Rules, 2002 and also the other requirements specified by EIC from time to time.

Please find enclosed herewith a Demand Draft bearing No. dated _____ for Rs._____ drawn in favour of _____ payable at _____ towards the application fee.

Section-I: Information		
A	**General**	
1	Name and address of the establishment seeking approval (Give Contact Numbers and E-mail, if any)	
2	Name and Addressed of the Registered office of the establishment (Give Contact Numbers and E-mail, if any)	
3	Name of the Chief Executive (MD/Mg. Partner/Proprietor) (Give Contact Numbers and E-mail, if any)	
4	Is the processing plant owned or leased by the applicant	Owned/leased
5	If leased, name of the plant owner, plant name and address.	
6	Month and Year of Construction	
7	Month and Year of last major alterations	
8	Month and Year of Commercial Production	
9	Approval requested for export to (Countries)	All countries including European Union /Countries other than EU.
10	Scope of approval. Give Name(s) of the product(s).	

11	Annual production during the previous year (a) honey (Within the scope of approval) (b) Others (specify)			
13(a)	Total exports during the last one year Financial Year Destinations (Countries) Quantity FOB Value in Rupees in Lakhs.			
(b)	Total Import during the last one year Financial Year Importing Countries Quantity			
14	Whether all year production or seasonal production			
15	Give number of working hours and shifts per day			
16	Give number of working days per week. Specify weekly holiday			
B.	**Information on Structure of the Establishment**			
17	Is there any cold/ambient storage for storage of food products? Give numbers and storage temperatures			
18	Are there storage facilities for in-process honey? Give type of storage facility and temperature of storage			
19	Whether the unit have heating facility to reduce the moisture content of the honey ? If yes, specify method and capacity of heating.			
21	Whether the unit have filtration facility?-I f yes, give details like type and capacity.			
22	Whether there is packing room for honey separate from processing activities and storage?			
23	Is there adequate integrated storage facility for finished honey ? Give details like type of storage, purpose, number of storages and capacity of storage.			
24	Give details like Numbers, type, capacities and registration numbers of vehicles of the establishment of its own for transportation of raw material and finished products	Numbers	Capacity	Regn. Nos.
	(a) Insulated Vehicles			
	(b) Non-insulated Vehicles			
25	Does the establishment hire outside vehicles? If yes, Give details as above.			
C.	**Information about personnel**			
26	Give number of veterinarian/technologists available in the establishment			

27	Give name, designation, qualifications and experience of the personnel qualified and responsible for developing, implementing and maintaining HACCP-based procedures.	
28	Give name, designation, qualifications and experience of the veterinarian(s)/ technologist(s) supervising the processing and other related operations	
29	Give name, designation, qualifications and experience of the qualified personnel, conducting microbiological and chemical analysis	
30	Give number of supervisors apart from the above, responsible for processing and handling of food products and maintenance of sanitation and hygiene in the establishment and honey production separately.	
31	Give number of male workers in the processing establishment in each shift and at washing facilities, if separate.	
32	Give number of female workers in the processing establishment in each shift	

Section-II: PRIMARY PRODUCTION AND RAW MATERIAL		
A	**Hygiene Provisions and record keeping in raw honey production and handling (collection and transport)**	
1	Whether the establishment has identified bee keeping farms/honey collection centres?	
2	Are bees keeping farms/ honey collection centres owned or contracted by the establishment?	
3	Whether the details of all honey collection centres supplying raw honey provided?	
4	Are bees undergoing medical treatment and likely to transfer residues to the raw honey identified & not used for human consumption?	
5	Is there any infrastructure for educating farmers for clean honey production?	
6	Are there any incentive given to the farmers for clean honey production?	
7	Give the details of the identified bee farms like name, address, capacity, and distance from the processing establishment, etc. (separate list may be attached) along with location map showing route and distance from the processing establishment, on an A4 paper.	
8	Are these under supervision/controls of the unit to ensure the wholesomeness of the raw honey procured? Specify.	
9	Are there controls to ensure good farming practices and good veterinary practices?	
10	Are there adequate measures to protect raw honey production against any contamination	

11	Are there adequate measures to control contamination arising from the air, soil, water, feed, fertilizers, veterinary medicinal products and biocides and the storage, handling and disposal of waste in raw honey production and associated operations	
12	Are there controls to prevent use of prohibited antibiotics/pharmacological substances and Chemicals?	
13	Are there adequate measures relating to bee health and welfare that have implications for human health, including programmes for the monitoring and control of zoonoses and zoonotic agents in raw honey production and associated operations?	
14	Is there cleaning and where necessary, disinfecting of facilities used in connection with honey production and associated operations, including facilities used to store and handle feed?	
15	Is there cleaning and where necessary, disinfecting of equipment, containers, crates, vehicles and vessels?	
16	Is the water used potable or clean, where necessary, to prevent contamination?	
17	Are the personnel trained on health risks and the personnel, handling foodstuff in good health?	
18	Is there prevention of animals and pests from causing contamination?	
19	Is the waste and hazardous material handled and stored properly to prevent contamination?	
20	Is there prevention of the introduction and spreading of contagious diseases transmissible to humans through food, including taking precautionary measures when introducing new bee species and reporting suspected outbreaks of such diseases to the competent authority	
21	Are the samples (water, honey, etc.) drawn for relevant analyses that have importance to human health and records maintained?	
22	Is there correct use of veterinary medicinal products?	
23	Is there appropriate remedial action when informed of problems identified during official controls	
24	Specify the mode of transport of raw honey from the Bee keeping farm/ honey collection centre	
25	Are there records relating to measures put in place to control hazards in an appropriate manner?	
26	Are there records of nature and origin of floriculture fed to the bees?	
27	Are there records of veterinary medicinal products or other treatments administered to the bees, dates of administration and withdrawal periods?	
28	Are there records of the occurrence of diseases that may affect the safety of honey?	
29	Are there records of other relevant reports on checks carried out on bees or raw honey?	

30	Are there records of the details of employees such as veterinarian and farm technicians, assisting in raw honey production	
B	**Requirement for Premises & Equipment**	
31	Are there adequate measures to protect honey production against any contamination?	
32	Is the premise for storage of honey protected against vermin and have adequate separation from premises where bees are kept?	
33.	Are the surfaces of equipment that are intended to come into contact with honey (utensils, containers etc.) washable and non toxic, and sufficient inert to preclude substances from being transferred to food in quantities large enough to endanger human health or to bring about unacceptable change in the composition of food or deterioration of its organoleptic properties?	
34	Are the bees keeping farms/honey collection centres under supervision/controls of the unit to ensure the wholesomeness of the raw honey procured?	
C	**Staff Hygiene**	
35	Does person performing extraction of honeying/or handling of raw honey wear suitable clean clothes and maintain high degree of personal hygiene and is medically fit for the purpose?	
36.	Are there suitable facilities near place of honey collection centre for washing hands and arms?	

Section-III: GENERAL FACILITY AND HYGIENE REQUIREMENTS OF THE PROCESSING ESTABLISHMENTS		
A.	**General requirements for premises and infrastructure**	
1.	**Premise**	
(a)	Whether it has defined curtilage and roads around the building concreted or tarred or turfed?	
(b)	Is it kept clean and maintained in good repair and free from swamps, stagnated water, dumps, rodent harbourage, other animals, environmental contaminations like smoke, objectionable odours, dust, etc., etc.?	
2.	**Layout, design, construction, location and size of food premises**:	
(a)	Does it permit adequate maintenance, cleaning and/or disinfecting, avoid or minimize air-borne contamination and provide adequate working space to allow for the hygienic performance of all operations?	
(b)	Does it protect against the accumulation of dirt, contact with toxic materials, the shedding of particles into food and the formation of condensation or undesirable mould on surfaces	
(c)	Does it permit good food hygiene practices, including protection against contamination and, in particular, pest control	

(d)	Where necessary, does it provide suitable temperature-controlled handling and storage conditions of sufficient capacity for maintaining food at appropriate temperatures and designed to allow those temperatures to be monitored and, where necessary, recorded.	
(e)	Is it kept clean and maintained in good repair and condition?	
3	**Lavatories**	
(a)	Are there an adequate number of flush lavatories available and connected to an effective drainage system?	
(b)	Are the lavatories opened directly into rooms in which food is handled?	
4	**Washing facilities:**	
(a)	Are there an adequate number of washbasins available, suitably located and designated for cleaning hands at all entry points and in food handling areas?	
(b)	Are the washbasins for cleaning hands provided with hot and cold running water, materials for cleaning hands like detergent, disinfectant, etc. and for hygienic drying e.g. single use towels?	
(c)	Are there feet disinfection facilities like foot dip provide, wherever applicable?	
5	**Ventilation:**	
(a)	Is there suitable and sufficient means of natural or mechanical ventilation?	
(b)	Is the mechanical airflow from a clean area to a contaminated area?	
(c)	Are the ventilation systems constructed as to enable filters and other parts requiring cleaning or replacement, readily accessible?	
6	Do the **sanitary conveniences** have adequate natural or mechanical ventilation?	
7	Do the premises have **adequate** natural and/or artificial **lighting**?	
8	**Drainage facilities**	
(a)	Are they adequate for the purpose intended?	
(b)	Are they designed and constructed to avoid the risk of contamination.	
(c)	Where drainage channels are fully or partially open, are they designed as to ensure that waste does not flow from a contaminated area towards or into a clean area, in particular an area where foods likely to present a high risk to the final consumer are handled?	
(d)	Is there adequate slope to drains	
(e)	Are open drains covered by grids	
9	**Change room facilities**	
(a)	Are adequate separate changing facilities (change room and facilities therein), where necessary, provided for personnel handling raw material, unprocessed products and processed products?	
(b)	Is there separate facility for male and female workers?	
(c)	Whether changing room facility is integrated into the plant layout properly?	
(d)	Does the changing room have smooth walls, floors and washbasins with soaps, disposable towels, nail brushes and non-hand operable taps?	
(e)	Whether there is arrangement for	
i)	Change of footwear	
ii)	Keeping street clothes separately	

iii)	Lockable cupboards	
iv)	Collection of soiled working clothes	
v)	Gumboots	
vi)	Headgear and wherever necessary gloves/ mouth cover	
(f)	Is there suitable in-house arrangement to launder the working clothes of the workers?	
10	Is there **storage for cleaning agents** and disinfectants in areas where food is not handled?	
B.	**Specific requirements in rooms where foodstuffs are prepared, treated or processed**	
11	**Design and layout** to permit good food hygiene practices, including protection against contamination between and during operations	
(a)	**Floor**	
i)	Are the surfaces maintained in a sound condition and easy to clean and, where necessary, to disinfect?	
ii)	Is it impervious, non-absorbent, washable and non-toxic materials or appropriate to prevent contamination?	
iii)	Do they allow adequate surface drainage?	
(b)	**Walls**	
i)	Are the surfaces maintained in a sound condition and are easy to clean and, where necessary, to disinfect?	
ii)	Is it impervious, non-absorbent, washable and non-toxic materials or appropriate to prevent contamination and does have a smooth surface up to a height appropriate for the operations?	
(c)	**Ceiling:** Are the ceilings (or, where there are no ceilings, the interior surface of the roof) and overhead fixtures constructed and finished so as to prevent the accumulation of dirt and to reduce condensation, the growth of undesirable mould and the shedding of particles?	
(d)	**Windows and other openings**	
i)	Are they constructed to prevent the accumulation of dirt?	
ii)	Are those, which can be opened to the outside environment, where necessary, fitted with insect-proof screens, which can be easily removed for cleaning?	
iii)	Are, where open windows would result in contamination, kept closed and fixed during production?	
(e)	Are the **doors** easy to clean and, where necessary, to disinfect and have smooth and non-absorbent surfaces or appropriate to prevent contamination?	
(f)	**Surfaces** (including surfaces of equipment)	
i)	Are, in areas where food is handled and in particular those in contact with food maintained in a sound condition and are easy to clean and, where necessary, to disinfect?	
ii)	Are these smooth, washable corrosion-resistant and non-toxic materials or appropriate to prevent contamination	
12	**Cleaning facilities**	
i)	Are adequate facilities provided, where necessary, for the cleaning, disinfecting and storage of working utensils and equipment?	
ii)	Are these facilities constructed of corrosion-resistant materials, easy to clean and do they have an adequate supply of hot and cold water?	

iii)	Do the every sink or other such facility provided for the washing of food have an adequate supply of hot and/or cold potable water and kept clean and, where necessary, disinfected?	
iv)	Are the cleaning agents and disinfectants are stored separately under lock and key?	
C	**Transport**	
13	Are the conveyances and/or containers used for transporting raw honey/food kept clean, sanitised and maintained in good repair and condition to protect food from contamination and are, where necessary, designed and constructed to permit adequate cleaning and/or disinfection?	
14	Are the receptacles in vehicles and/or containers used for transporting anything other than food where it may result in contamination?	
15	Are the conveyances and/or containers, where used for transporting anything in addition to food or for transporting different foodstuffs at the same time, has effective product separation?	
D	**Equipment requirements**	
16	Are all the articles, fittings and equipment with which food comes into contact	
(i)	Effectively cleaned and, where necessary, disinfected at a frequency sufficient to avoid any risk of contamination?	
(ii)	Constructed, of such materials and kept in such good order, repair and condition as to minimize any risk of contamination?	
(iii)	with the exception of non-returnable containers and packaging, constructed, of such materials and kept in such good order, repair and condition as to enable them to keep clean and, where necessary, disinfected?	
(iv)	Installed in such a manner that does allow adequate cleaning of the equipment and the surrounding area?	
17 (i)	Is equipment, where necessary, fitted with an appropriate control device such as time, temperature, pressure, flow rate, etc. ?	
(ii)	Are the process control equipment and devices calibrated at regular intervals?	
18	Are the chemical additives, where have to be used to prevent corrosion of equipment and containers, used in accordance with good practice?	
E	**Food waste**	
19	Are the non-edible by-products and other refuse removed as quickly as possible from rooms where food is present so as to avoid their accumulation?	
20	Are the non-edible by-products and other refuse deposited in closable containers or any other appropriate foot operable container to prevent contamination?	
21	Are the containers made of an appropriate construction, kept in sound condition, easy to clean and, where necessary, to disinfect?	
22 (i)	Is there adequate provision made for the storage and disposal of food waste, non-edible by-products and other refuse?	
(ii)	Are the refuse stores are designed and managed in such a way as to enable them to keep clean and, where necessary, free of animals and pests?	

23	Is all waste eliminated in a hygienic and environmentally friendly way in accordance with state pollution control board's consent and does not constitute a direct or indirect source of contamination?	
F	**Water supply**	
24 (i)	Is there documented water management system? Are the outlets identified and serially numbered in the plumbing layout diagram?	
(ii)	Is the water tested as per 98/83/EC or IS:4251 for Potability, as applicable?	
25	Is there adequate supply of potable water, which is used whenever necessary to ensure that foodstuffs are not contaminated *(clean water may also be used for external washing)?* What is the method of treatment?	
26 (i)	Is the non-potable water circulated in a separate duly identified system, where it is used for fire control, steam production, refrigeration and other similar purposes?	
(ii)	Is the non-potable water connects with, or allows reflux into, potable water systems?	
27 (i)	Is the recycled water used, if any, in processing or as an ingredient presents a risk of contamination?	
(ii)	Is it of the same standard as potable water, acceptable to the competent authority and will not affect wholesomeness of the foodstuff in its finished form?	
28	Is the steam used directly in contact with food likely to contain substance that presents a hazard to health or likely to contaminate the food?	
29 (i)	Is there appropriate measure to prevent contamination through back suction?	
(ii)	Is water storage tank easily cleanable and protected from outside contamination? State frequency of cleaning water tanks.	
G	**Personal hygiene**	
30	Is every person, working in a food-handling area maintaining a high degree of personal cleanliness and wearing suitable, clean and, where necessary, protective clothing?	
31	Is person suffering from, or being a carrier of a disease likely to be transmitted through food or afflicted, for example, with infected wounds, skin infections, sores or diarrhoea, permitted to handle food or enter any food-handling area in any capacity, if there is any likelihood of direct or indirect contamination? Are the health cards maintained for all employees?	
32	Does any person so affected and employed in the establishment and who is likely to come into contact with food report immediately the illness or symptoms, and if possible their causes, to the processing establishment?	
H	**Provisions applicable to foodstuffs**	
33	Does the establishment accept raw materials or ingredients, other than food, or any other material used in processing products, even though they are known to be, or might reasonably be expected to be, contaminated with parasites, pathogenic microorganisms or toxic, decomposed or foreign substances to such an extent that, even after the establishment applies normal hygienic sorting and/or preparatory or processing procedures, the final product would be unfit for human consumption?	

34	Are the raw materials and all ingredients stored in the premises kept in appropriate conditions designed to prevent harmful deterioration and protect them from contamination?	
35	At all stages of production, processing and distribution, is the food protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state?	
36	**Pest control**	
(i)	Are adequate documented procedures in place to control pests?	
(ii)	Whether bait map showing serially numbered bait stations provided?	
(iii)	Are adequate procedures in place to prevent domestic animals from having access to places where food is prepared, handled or stored?	
37	**Storage conditions**	
	Are the raw materials, food ingredients, intermediate products and finished products likely to support the reproduction of pathogenic microorganisms or the formation of toxins, kept at temperatures that might result in a risk to health?	
38	Does the establishment have suitable rooms for manufacturing, handling and wrapping processed foodstuffs, large enough for separate storage of raw materials from processed material and sufficient separate refrigerated storage?	
39	Are the foodstuffs, where held or served at chilled temperatures, cooled as quickly as possible following the heat-processing stage or final preparation stage when no heat process is applied, to a temperature, which does not result in a risk to health?	
40	Are hazardous and/or inedible substances adequately labelled and stored in separate and secure containers?	
I	**Wrapping and packaging of foodstuffs**	
41	Is the material used for wrapping and packaging a source of contamination?	
42	Are the wrappings and packing materials stored in such a manner that they are exposed to a risk of contamination?	
43	Are wrapping and packaging operations carried out so as to avoid contamination of the products? *(Where appropriate and in particular in the case of cans and glass jars, the integrity of the container's construction and its cleanliness must be assured.)*	
44(a)	Is the wrapping and packaging material re-used for foodstuffs easy to clean and, where necessary, to disinfect?	
(b)	Is the packaging material sufficient inert?	
J	**Heat treatment**	
45	Does the heat treatment process used to process an unprocessed product or to process further a processed product:	
(i)	Prevent the product from becoming contaminated during the process?	
46 (i)	Does the process employed achieve the desired objectives?	
(ii)	Are the main relevant parameters (particularly temperature, pressure, sealing and microbiology), checked regularly including by the use of automatic devices?	
47	Does the process used conform to an internationally recognized standard (for example heat treatment, filteration etc.)?	
K	**Maintenance**	

48	Is there appropriate maintenance schedule for maintaining infrastructure and equipment facilities and records thereof?	
49	Whether all equipment labelled and marked?	
L	**Training**	
50	Are the food handlers supervised and instructed and/or trained in food hygiene matters commensurate with their work activity?	
51	Have the persons those responsible for the development and maintenance of the procedure for the operation of relevant guides received adequate training in the application of the HACCP principles?	
52	Are the persons those responsible for compliance with the requirements of national law trained?	
M	**Testing facility**	
53	Is there in-house testing facility for analysis of raw materials, in-process samples, finished products, hygiene and sanitation control samples, etc.?	

Section-IV: REQUIREMENTS CONCERNING PRODUCTS		
A	**Application of the Identification Mark**	
1	Is the Identification mark and details of the approved establishment applied before the product leaves the establishment?	
a)	Are the consignments of honey, destined not for retail but for use as an ingredient in the manufacture of another product, have label giving the temperature at which the honey must be maintained and the period during which conservation may thus be assured?	
2	Is new mark applied to a product after further processing in another approved establishment with the approval number of the establishment where these operations take place?	
B	**Form of the Identification Mark**	
3	Are marks legible and indelible and the characters easily decipherable? Is It clearly displayed for the competent authorities?	
4	Does the mark indicate the name of the country in which the establishment is located?	
C	**Method of Marking**	
5	Is the mark applied directly to the product, the wrapping or the packaging, or printed on a label affixed to the product, the wrapping or the packaging depending on the presentation of different products of animal origin?	
6	Is the mark an irremovable tag of resistant material?	
D	**HACCP-based Procedures** (Hazard analysis and critical control points)	
7	Are the HACCP principles in place, implemented and maintained?	
8	**The HACCP principles**	
a)	Are the hazards, if any, need to be prevented, eliminated or reduced to acceptable levels identified appropriately?	
b)	Are the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels identified appropriately?	
c)	Are the critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards established appropriately?	
d)	Are the monitoring procedures at critical control points established and implemented effectively?	

e)	Are the corrective actions when monitoring indicates that a critical control point is not under control established?	
f)	Are the procedures, which need to be carried out regularly, to verify that the measures outlined in (a) to (e) above are working effectively, established?	
g)	Are the documents and records commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined in (a) to (f) above established?	
9	Are the procedure reviewed when any modification is made in the product, process, or any step to make the necessary changes to it?	
10	Is the evidence of compliance with HACCP principles furnished to the competent authority?	
11	Are the documents up-to-date at all times?	
12	Are the documents and records retained for an appropriate period?	
13	Traceability of raw honey procurement: Do the procedures guarantee that each lot of raw honey accepted onto premises:	
(a)	Is properly identified?	
(b)	Is accompanied by the relevant information from the holding of provenance controlled / supervised by the processing establishment?	
(c)	Come from a holding or an area subject to a movement prohibition or other restriction for reasons of animal or public health, except when the competent authority so permits?	
(d)	Is clean?	
(e)	Is fit for consumption, as far as the food business operator can judge?	
(f)	Is in a satisfactory state?	
14	In the event of failure to comply with any of the requirements listed under point 13 (a to f) above, is it notified to the approved veterinarian/ technologist and took appropriate measures?	
E)	**Food Chain Information**	
15	Does the processing establishment is accepting honey without request and relevant food safety information, contained in the records kept at the holding of provenance, such as;	
(i)	The status of the collection centre or the regional bee health status?	
(ii)	The health status of honey supplied to the establishment?	
(iii)	Veterinary medicinal products or other treatments administered to the bees within a relevant period and with a withdrawal period greater than zero, together with their dates of administration and withdrawal periods?	
(iv)	The occurrence of diseases that may affect the safety of honey?	
(v)	The results, if they are relevant to the protection of public health, of any analysis carried out on samples taken from the bee keeping farm or other samples taken to diagnose diseases that may affect the safety of honey products, including samples taken in the framework of the monitoring and control of bee parasites and residues?	
(vii)	Production data, when this might indicate the presence of disease?	
(viii)	The name and address of the veterinarian attending the bee keeping farm of provenance?	

16	If any lot of raw honey arrives at the processing establishment without food chain information, is it notified to the approved technologist immediately?	
17	Are the raw honey processed with the permission of the approved technologist?	

Section-V: SPECIFIC REQUIREMENTS		
A	**Raw honey criteria & Handling**	
1	Is the raw honey stored and transported at a temperature preferably constant, which is best suited to assure optimal conservation of their hygiene properties?	
2	Is the raw honey subjected to physicochemical analysis for wholesomeness?	
B	**Honey Processing**	
3	Requirements for Establishments	
(i)	Does a batch that has been insufficiently processed, undergo processing again immediately in the same establishment, rendering the reprocessing fit for human consumption?	
4	Analytical Specifications	
(i)	Is the unit having in-house facilities for inspection and testing?	
(ii)	Is the unit having separate qualified and competent personnel for conducting physical, chemical and microbiological tests?	
C	**Other Food Ingredients/additives/preservatives**	
5	Specify the additives/ preservatives used by the unit (separate list to be enclosed)	
6	Whether the Honey complies with the standards as per S.O. 276 (E), 277 (E) both dated 4th march 2002 & S.). 1441(E) dated 19th December 2003	
D	**Finished Honey**	
7	Is the food chain information (traceability) for raw honey procurement, processing and final product maintained	
8	Does the final product contain honey from countries other than of Indian origin	

Section-VI: Any other relevant information:

Yours faithfully,

Signature
Name
Designation

Place :
Date :

Company Seal

Check list of enclosures:

(1) Prescribed fee in the form of Demand Draft
(2) HACCP Manual (including Organisational Chart of the establishment, Sanitary Standard Operating Procedures, process flow chart (s) with product description, manufacturing details in each step, Self-Residue Monitoring Plan.)
(3) Attested copy of Potability certificate for water (Directive 98/83/EC or IS:4251, as applicable)
(4) Location and Layout plan of the establishment (site plan and building plan in A-4 size), showing all infrastructure and equipment facilities
(5) Layout showing the process/product flow, personnel flow, water flow (Indicating serially numbered water taps) and effluent flow, on A4 size paper separately, in evidence of meeting food safety requirements
(6) Certified Copy of the legal identify of establishment
(7) Certified copy of Lease Deed, if applicable
(8) List of identified farms meeting the minimum requirements specified at I C from which the establishment intend to procure honey for processing along with details like address, and distance from the processing establishment
(9) Bio-data of apinarian/ technologist(s/ supervisor/chemist)
(10) Guarantee and undertaking
(11) Attested copy of the consent letter issued by the State Pollution Control Board.
(12) Attested copy of the order allotting Importer-Exporter Code (IEC) Number.
(13) List of additives/ preservatives used in the processing.
(14) Technical Specifications of the product
(15) In house - lab facilities (please indicate the test carried out along with equipments and method used for the same)

Note:

a) The application must be in duplicate,
b) In case where a non-EU approved establishment submits application for the approval to process honey for exports to the EU countries, the documents, which were submitted earlier, need not be submitted again, if there is no change.

Annexure IA

UNDERTAKING

(To be submitted in duplicate on company's letterhead along with application for approval of processing establishment.)

Reference No. : _____ Date:

To

The Export Inspection Agency- ----------,
(*Address)*

Sub: Application for approval processing establishment.

Sir,

With reference to our application ref. No. --------- dated ----------, we hereby undertake the following in respect of the processing of honey in our establishment.

We handle, process, store and transport honey under proper hygienic conditions so as to meet the health requirements laid down by the Government of India/Importing Countries.

HACCP system has been established and implemented by us.

We use only approved disinfectants for water at acceptable level, and carry out checks on water in line with EC recommendations (98/83/EC) / or as per IS 4251 (in case of non EU)

Yours faithfully,

Signature of Authorised Signatory
Name:
Designation:
Date:
Place:

Strike whichever is not applicable.

Annexure IB

GUARANTEE

(To be submitted in duplicate on company's letterhead along with application for approval of processing establishments to the concerned EIA)

Reference No. : Date:

To

The Export Inspection Agency- ----------,
(*Address)*

Sub: Guarantee for approval of processing establishment by EIA

Sir,

In case, grant of approval to our establishment, we hereby guarantee the following:

HACCP that has been established and implemented by us shall be monitored and maintained continuously through out the food chain.

We will not obtain Health Certificates for our export consignments from authorities other than the Export Inspection Agency-

We will not use semi-processed or processed honey coming from an unapproved establishment.

We shall provide to the Competent Authority and its representatives free access, at all times, to all parts of the establishment and to the records pertaining to production/quality of products being processed by us.

If the results of checks carried out by us or any information at the disposal of our personnel reveal the risk of health or suggest that such a risk might exist, we shall inform you immediately and take corrective actions under your official supervision.

We shall not export any honey product other than what is included in scope of approval.

We will not store the honey of the other approved establishments in our premises without prior permission from the EIA concerned. We will not store any product of an unapproved establishment.

We will not misuse the CFEs issued to us and will maintain proper records of the same.

You may withdraw the approval granted to our establishment for processing of honey in case of violation of any of the above guarantees by us.

Signature of the
Place: Head of Production (Name and designation)
Date :

Place:
Date : Counter signature of Chief Executive Officer of the approved establishment (Name and designation)

Annexure IC

REQUIREMENTS FOR APPROVAL OF ESTABLISHMENT FOR PROCESSING HONEY FOR EXPORT

1. Surroundings

1.1 The premises shall be kept clean and shall have defined curtilage. All the roads in the premises shall be concreted / tarred or turfed to prevent wind blown dust.

1.2 There shall not be any swamps, stagnant water or signs of any rodent harbourage inside the premises.

1.3 The surroundings shall be reasonably free from objectionable odours, smokes, dust and other contaminants.

2. Constructions and Layout.

2.1 The immediate surrounding of the building shall be tarred/ concerted to prevent contamination from the surroundings.

2.2 The establishment shall be housed in a building of permanent nature affording sufficient protection from the environment and shall be of sufficient size for the work to be carried out under hygienic conditions. The design and layout shall be such as to preclude contamination.

2.3 The lay out of different sections shall be such as to facilitate smooth and orderly flow of work and to prevent possible cross contamination and backtracking. All the honey handling areas shall be separate from areas used for residential purpose.

2.4 There shall be adequate lighting and ventilation and light fixtures shall be protected with proper covering.

2.5 The layout shall ensure sufficient space in different sections for machinery, equipment, personnel etc. without congestion.

2.6 The building shall provide sufficient protection against the entry and harbourage of rodent, insects, milch animals, other animals etc.

2.7 All the entry points shall have suitable air curtains or other suitable arrangements to prevent the entry of flies.

2.8 Wood shall not be used in the factory, except inside the cold storage.

2.9 Non -operative areas inside the establishment shall be properly cordoned off to avoid possible cross- contamination.

3. Honey receiving section.

3.1 There shall be a raised platform for receiving the material and the sides and roof of the platform shall be sufficiently protected from extraneous contamination.

3.2 The raw honey receiving section shall be sufficiently separated from processing area to prevent contamination

3.3 Signboards directing the employees to wash and sanitise hands before entering and after each absence shall be installed

3.4 Air curtains/fly killers shall be installed to prevent the entry of flies when the door is opened.

4. Workers entry points.

4.1 Suitable washing and sanitizing facilities for feet and hands shall be provided at the entry points.

4.2 The washbasins shall be provided with foot operable taps or non-hand operable taps.

4.3 Liquid soaps, disinfectants, nailbrushes, single use towels / hand dryers etc. shall be provided in sufficient quantities at all entry points.

4.4 Waste bins provided for collecting used towels shall be of foot-operated type.

5. Ceiling walls and floors.

5.1 The floor of the processing areas shall be smooth, impermeable and easy to clean and disinfect. There shall be no water stagnation on the floor. The floor shall have sufficient slope opposite to the flow of work or side ways.

5.2 The wall to floor and wall-to-wall junctions shall be rounded off to facilitate easy cleaning.

5.3 The walls should be durable, smooth, light coloured and easy to clean and disinfect.

5.4 The walls should not have projections and the entire fitting on the wall shall be made in such a way so as to clean and disinfect them easily. If possible, the electric switches or other fittings shall be fixed in other areas where no handling of honey product is carried out.

5.5 The ceiling shall be free from cracks and open joints and shall be smooth and easy to clean.

5.6 If structural elements or fittings are suspended below the ceiling, suitable protection shall be given to prevent falling of debris, dust or droppings.

6. Doors, windows and ventilators.

6.1 All the doors shall be tight fitting and the windows and ventilators shall have fly proofing nets to prevent the entry of flies.

6.2 All doors and windows shall be durable and made of corrosion resistant material and windowsills, if any, shall slope inwards. The windows/ ventilators shall be constructed at least one meter above the floor.

6.3 The doors shall be of self-closing type .

6.4 Mechanical ventilation/ exhaust fans shall be provided in areas were stagnation of air, condensation of fluid etc. are present

6.5 The opening of ventilation/ exhaust fan shall be provided with suitable fly proofing system.

7. Drainage

7.1 There shall be adequate drainage facility and slope of the drainage shall be opposite to the flow of work/ material.

7.2 The open end of the drainage shall be protected by grids against the entry of rodents.

7.3 The drains shall be of adequate size having sufficient slope for easy cleaning.

8. Tables, utensils, equipments and machineries

8.1 All the utensils and equipments shall be made of such material that they under normal conditions of use don't transfer their constituents to food in quantities harmful to the safety or quality of the food, non-corrodible material and shall be smooth with out cracks and crevices and easy to clean and disinfect.

8.2 All food contact surfaces shall be free from rust and paints.

8.3 Suitable arrangements shall be made to drain the water from the tables directly into the drainage with out falling on the floor.

8.4. The equipments shall be fitted with necessary gauges to indicate the temperature, etc. The recording devices shall be calibrated at specified intervals.

8.6 Honey store rooms shall be clean having smooth floor, walls and roof and shall have suitable mechanism to control the temperature, if required.

9. Cold storages optional .

9.1 Cold rooms/storage bins having adequate size shall be provided in the processing section.
9.3 The floor, ceiling and walls of the cold storage and other storage rooms shall be smooth and easy to clean and disinfect.

9.4 Proper steps shall be taken to avoid contamination of the materials stored.

9.5 There shall be adequate lighting with protective covers.

10. Change rooms and toilets

10.1 Adequate number of change rooms for workers shall be provided for high risk and law risk areas.
10.2 The change rooms shall be of adequate size having smooth washable walls and floors.
10.3 **There shall be flush lavatory and the lavatories shall not open directly to the working area**.
10.4 The toilets shall have self-closing doors and proper fly proofing system.
10.5 The change rooms shall have foot-operated washbasin provided with adequate soap, nail brushes and single used towels. There shall be a foot operated waste bin to collect the used towels.
10.6 There shall be lockable cupboards and facility for keeping gumboots, shoes and chapels inside the change room.
10.7 Suitable arrangements shall be made by the establishment to launder the working clothes of the workers.

11. Store rooms.

11.1 There shall be separate stores for wet and dry items and the chemicals/ disinfectants should be properly labelled.
11.2 Packing material store shall be of adequate size with proper fly and dust proofing system
11.3 Cartons shall be kept on cleanable pallets other than wood, away ***from*** the walls and covered properly. There shall be enough space for a person to walk around.
11.4 Pest and rodent control measures shall also extend to the storerooms.

12. Water.

12.1 Water used in the factory shall be of potable nature and shall meet the requirements of EC Directives No. 98/83/EC or IS : 4251 as the case may be.
12.2 Potable water shall be used also for cleaning utensils, machinery, tables etc.
12.3 A suitable water management system shall be followed and this shall include use of plumbing diagrams showing the entire reticulation of the water, identifying each tap with consecutive numbers.
12.4 Water store tank, both ground level and overhead, should be protected and cleaned regularly.
12.5 The taps having hose connections shall be fitted with non- return valves
12.5 The water tanks shall be cleaned regularly as per SOP as per pre-decided frequency.

12.5 If water is brought from external source i.e. mobile water tankers, it should be cleaned and disinfected periodically.

13. Personal Hygiene

13.1 The employees engaged in processing activities shall be free from communicable diseases, open sores and wounds.
13.2 They shall be medically examined periodically and shall maintain individual health cards issued by an approved medical officer showing that they are fit to handle food products and suitable to work in honey processing plant.
13.3 Prophylactic injections shall be administered to the employees and record maintained thereof.
13.4 Communicable diseases in their homes to be notified and the employees shall be medically examined after each absence due to illness.
13.5 All workers shall be provided with sufficient sets of clean work dress and headgears.
13.6 A person shall be made responsible for maintenance of personal hygiene of the workers.

14. In-house laboratory

14.1 The establishment shall have a well-equipped in house laboratory for testing microbiological and other chemical parameters.
14.2 The testing shall be done by qualified veterinarian/ technologist (s) approved by the Competent Authority

15. Transportation.

15.1 The establishment shall have suitable and adequate facilities for the transportation of raw material, finished products etc.
15.2 The food contact surfaces of the vehicles shall be smooth made of non-corrosive material and easy to clean and disinfect. They shall be cleaned properly before loading and after unloading and the records maintained thereof.

16. Maintenance.

16.1 There shall be a documented procedure for maintenance of all sections, equipments, machineries etc.
16.2 The machineries/ equipments shall be marked with suitable identification numbers.

Annexure ID

DRUGS & PESTICIDES FOR MONITORING RESIDUES IN HONEY

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 • Vinclozolin	 ppb ppb ppb ppb ppb ppb ppb ppb ppb ppb	 20 5 25 25 25 25 5 5 5 10

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 IIA

EXPORT INSPECTION AGENCY - KOCHI / MUMBAI / CHENNAI/KOLKATA/DELHI
(MINISTRY OF COMMERCE & INDUSTRY)
GOVERNMENT OF INDIA

ADEQUACY AUDIT
for scrutiny of application and HACCP based food safety management system document

Name of the processing establishment : M/s.

Address of the processing establishment :

District:
State:
Country: India.
Ph.
Fax:
E.mail:

Address of the Regd. Office :

District:
State:
Country: India.
Ph.
Fax:
E.mail:

Scope of assessment : Adequacy audit of document to adjudge suitability of the infrastructure and equipment facilities of the establishment for processing, handling and storage of Honey and HACCP based food safety management system.

Details of Adequacy audit *(HACCP document must be audited by an official having adequate knowledge of HACCP)*

Type of document for audit	Name and Designation of the Auditor	Authorised by	Date of audit	Remarks (satisfactory / unsatisfactory)
Scrutiny of application				
HACCP document				

Please find enclosed audit observations on desk audit of application and/or HACCP based FSM system, submitted for kind perusal and further necessary action.

Signature of Auditor
Name
Designation
Organization
Date

Annexure IIB

EXPORT INSPECTION AGENCY - KOCHI / MUMBAI / CHENNAI/KOLKATA/DELHI

(MINISTRY OF COMMERCE & INDUSTRY)
GOVERNMENT OF INDIA

AUDIT OBSERVATIONS SHEET

Scope: _____ *(e.g. Adequacy audit, HACCP audit, Assessment, etc.)*

S.No.	Reference	Observations	Remarks

Recommendations of the auditor:

Signature of Auditor
Name
Designation
Organization
Date

Annexure IIIA

EXPORT INSPECTION AGENCY - KOCHI / MUMBAI / CHENNAI/KOLKATA/DELHI
(MINISTRY OF COMMERCE & INDUSTRY)
GOVERNMENT OF INDIA

ASSESSMENT REPORT
FOR INFRASTRUCTURE AND EQUIPMENT FACILITIES

Name of the processing establishment	: M/s.			
Address of the processing establishment	Address: District: State: Country: India. Ph. Fax: E.mail:			
Address of the Regd. Office	Address: District: State: Country: India. Ph. Fax: E.mail:			
Scope of assessment	: On-site verification to adjudge suitability of the infrastructure and equipment facilities of the establishment for processing, handling and storage of honey			
Date(s) of assessment	:			
Opening Meeting Location and date				
Closing Meeting Location and date				
Name of IDP members	Designation	Organization	Opening Meeting (Sign)	Closing Meeting (Sign)
Name of Representative(s) of the establishment	Designation	Organization	Opening Meeting (Sign)	Closing Meeting (Sign)

Section-I: Information		
A	**General**	
1	Name of the Chief Executive (MD/Mg. Partner/Proprietor) (Give Contact Numbers and E-mail, if any)	
2	Is the processing plant owned or leased by the applicant	Owned/leased
3	If leased, name of the plant owner, plant name and address.	
4	Month and Year of Construction	
5	Month and Year of last major alterations	
6	Month and Year of Commercial Production	
7	Approval requested for export to (Countries)	All countries including European Union / Countries other than EU.
8	Scope of approval. Name(s) of the product(s).	
9	Additional activities, if any, in the same premise and other than the products mentioned above.	
10	Annual production during the previous year (a) Honey (Within the scope of approval) (b) Others (specify)	
11(a)	Total exports during the last one year Financial Year Destinations (Countries) Quantity FOB Value in Rupees in Lakhs.	
(b)	Total Import during last one year Financial Year Importing Countries Quantity	
12	Whether all year production or seasonal production	
13	Number of working hours and shifts per day	
14	Number of working days per week. Specify weekly holiday	
B.	**Information on Structure of the Establishment**	
15	No. of vehicles the establishment has for transportation of raw materials, finished products, water(if applicable) 1) Insulated Vehicle 2) Non-insulated vehicle 3) Three wheelers 4) Water tanker	No. Capacity Regd. No.
16	Does the establishment hire outside vehicles?	
17	Is there any cold/ambient storage for storage of food products?	

	Specify numbers and storage temperatures.	
18	Are there storage facilities for in-process honey? Specify type of storage facility and temperature of storage	
19	Whether the unit have heating facility to reduce the moisture content of the honey? If yes, specify method and capacity of Chilling.	
20	Is there facility for filteration of honey? Specify their capacities.	
22	Whether there is packing room for honey separate from processing activities and storage?	
23	Is there adequate integrated storage facility for finished honey? Specify type of storage, purpose, number of storages and capacity of storage.	
C.	**Information about personnel**	
33	Number of veterinarian/ technologists and available in the establishment	
34	Name, designation, qualifications and experience of the personnel qualified and responsible for developing, implementing and maintaining HACCP-based procedures.	
35	Name, designation, qualifications and experience of the veterinarian(s) and technologist(s) supervising the processing and other related operations	
36	Name, designation, qualifications and experience of the qualified personnel, conducting microbiological and chemical analysis	
37	Number of supervisors apart from the above, responsible for processing and handling of food products and maintenance of sanitation and hygiene in the establishment and honey production separately.	
38	Number of male workers in the processing establishment in each shift.	
39	Number of female workers in the processing establishment in each shift.	

Section-II: PRIMARY PRODUCTION AND RAW MATERIAL		
A	**Hygiene Provisions and record keeping in Honey Production and handling**	
1(i)	Whether the establishment has identified bee keeping farms/collection centres ?	
(ii)	Are bee keeping farms/collection centres owned or contracted by the establishment?	
(iii)	Whether the details of all bee keeping farms/collection centres supplying raw honey provided?	
(iV)	Are infected bee hives or suspected of being infected, isolated to avoid other bee hive's honey?	

(V)	Are bee hives/bees undergoing medical treatment and likely to transfer residues to the honey identified & not used for human consumption?	
Vi)	Is there any infrastructure for educating farmers for clean & wholesome honey production?	
Vii)	Are there any incentive given to the farmers for clean & wholesome honey production?	
B	**Requirement for Premises & Equipment**	
1	Are there adequate measures to protect honey production against any contamination?	
2	Is the premise for storage of honey protected against vermin and have adequate separation from premises?	
3.	Are the surfaces of equipment that are intended to come into contact with honey (utensils, containers etc.) washable and non toxic?	
4	Are the Bee keeping farms/ honey collection centre under supervision/controls of the unit to ensure the wholesomeness of the raw honey procured?	
C.	**Hygiene During honey collection and transport**	
1	Are there adequate measures to control contamination arising from the air, soil, water, feed, fertilizers, veterinary medicinal products and biocides and the storage, handling and disposal of waste in honey production and associated operations?	
2	Are there controls to prevent use of prohibited antibiotics/pharmacological substances and Chemicals?	
3	Are there adequate measures relating to animal health and welfare that have implications for human health, including programmes for the monitoring and control of diseases and bee parasites in honey production and associated operations?	
4	Is there cleaning and where necessary, disinfecting of facilities used in connection with raw honey production and associated operations, including facilities used to store and handle honey?	
5	Is there cleaning and where necessary, disinfecting of container, utensils, tanks etc. intended for transporting raw honey ,	
6	Is the water used potable or clean, where necessary, to prevent contamination?	
7	Are the personnel trained on health risks and the personnel, handling raw in good health?	
8	Is there prevention of animals and pests from causing contamination?	
8	Is the waste and hazardous material handled and stored properly to prevent contamination?	

9	Is there prevention of the introduction and spreading of contagious diseases transmissible to humans through food, including taking precautionary measures when introducing species of bees and reporting suspected outbreaks of such diseases to the competent authority	
10	Are the samples (water, honey, etc.) drawn for relevant analyses that have importance to human health and records maintained?	
11	Are there appropriate actions on account of the results of any relevant analysis carried out on samples taken from the bee hives or collection centres or other samples that have importance to human health?	
12	Is there correct use of veterinary medicinal products?	
13	Is there appropriate remedial action when informed of problems identified during official controls?	
14	Are there records relating to measures put in place to control hazards in an appropriate manner?	
15	Are there records of nature and origin of floriculture fed to the honey bees?	
16	Are there records of veterinary medicinal products or other treatments administered to the bees, dates of administration and withdrawal periods?	
17	Are there records of the occurrence of diseases that may affect the safety of honey?	
18	Are there records of other relevant reports on checks carried out on raw honey?	
19	Is honey from beehives showing clinical signs of bee disease/parasites used for human consumption?	
D	**Staff Hygiene**	
1	Does person performing collection of raw honey wear suitable clean clothes, gloves and maintain high degree of personal hygiene and is medically fit for the purpose?	
2.	Are there suitable facilities near place of Bee Keeping farms/collection centres for washing hands and arms?	

Section-III: GENERAL HYGIENE REQUIREMENTS		
A.	**General requirements for premises and infrastructure**	
1.	**Premise**	
(a)	Whether it has defined curtilage and roads around the building concreted or tarred or turfed?	
(b)	Is it kept clean and maintained in good repair and free from swamps, stagnated water, dumps, rodent harbourage, other animals, environmental contaminations like smoke, objectionable odours, dust, etc., etc.?	

2.	**Layout, design, construction, location and size of food premises:**	
(a)	Does it permit adequate maintenance, cleaning and/or disinfecting, avoid or minimize air-borne contamination and provide adequate working space to allow for the hygienic performance of all operations?	
(b)	Does it protect against the accumulation of dirt, contact with toxic materials, the shedding of particles into food and the formation of condensation or undesirable mould on surfaces	
(c)	Does it permit good food hygiene practices, including protection against contamination and, in particular, pest control	
(d)	Where necessary, does it provide suitable temperature-controlled handling and storage conditions of sufficient capacity for maintaining food at appropriate temperatures and designed to allow those temperatures to be monitored and, where necessary, recorded.	
(e)	Is it kept clean and maintained in good repair and condition?	
3	**Lavatories**	
(a)	Are there an adequate number of flush lavatories available and connected to an effective drainage system?	
(b)	Are the lavatories opened directly into rooms in which food is handled?	
4	**Washing facilities:**	
(a)	Are there an adequate number of washbasins available, suitably located and designated for cleaning hands at all entry points and in food handling areas?	
(b)	Are the washbasins for cleaning hands provided with hot and cold running water, materials for cleaning hands like detergent, disinfectant, etc. and for hygienic drying e.g. single use towels?	
(c)	Are the facilities for washing containers separate from the hand-washing facility?	
(d)	Are there feet disinfections facilities like foot dip provide, wherever applicable?	
5	**Ventilation:**	
(a)	Is there suitable and sufficient means of natural or mechanical ventilation?	
(b)	Is the mechanical airflow from a clean area to a contaminated area?	
(c)	Are the ventilation systems constructed as to enable filters and other parts requiring cleaning or replacement, readily accessible?	
6	Do the sanitary conveniences have adequate natural or mechanical ventilation?	
7	Do the premises have adequate natural and/or artificial lighting?	
8	**Drainage facilities**	
(a)	Are they adequate for the purpose intended?	
(b)	Are they designed and constructed to avoid the risk of contamination.	
(c)	Where drainage channels are fully or partially open, are they designed as to ensure that waste does not flow from a contaminated area towards or into a clean area, in particular an area where foods likely to present a high risk to the final consumer are handled?	
(d)	Is there adequate slope to drains ?	
(e)	Are open drains covered by grids?	

9	**Change room facilities**	
(a)	Are adequate separate changing facilities (change room and facilities therein), where necessary, provided for personnel handling raw material, unprocessed products and processed products?	
(b)	Is there separate facility for male and female workers?	
(c)	Whether changing room facility is integrated into the plant layout properly?	
(d)	Does the changing room have smooth walls, floors and washbasins with soaps, disposable towels, nail brushes and non-hand operable taps?	
(e)	Whether there is arrangement for	
i)	Change of footwear	
ii)	Keeping street clothes separately	
iii)	Lockable cupboards	
iv)	Collection of soiled working clothes	
v)	Gumboots	
vi)	Headgear and wherever necessary gloves/ mouth cover	
(f)	Is there suitable in-house arrangement to launder the working clothes of the workers?	
10	Is there storage for cleaning agents and disinfectants in areas where food is not handled?	
B.	**Specific requirements in rooms where foodstuffs are prepared, treated or processed**	
11	Design and layout to permit good food hygiene practices, including protection against contamination between and during operations	
(a)	**Floor**	
i)	Are the surfaces maintained in a sound condition and easy to clean and, where necessary, to disinfect?	
ii)	Is it impervious, non-absorbent, washable and non-toxic materials or appropriate to prevent contamination?	
iii)	Do they allow adequate surface drainage?	
(b)	**Walls**	
i)	Are the surfaces maintained in a sound condition and are easy to clean and, where necessary, to disinfect?	
ii)	Is it impervious, non-absorbent, washable and non-toxic materials or appropriate to prevent contamination and does have a smooth surface up to a height appropriate for the operations?	
(c)	Ceiling: Are the ceilings (or, where there are no ceilings, the interior surface of the roof) and overhead fixtures constructed and finished so as to prevent the accumulation of dirt and to reduce condensation, the growth of undesirable mould and the shedding of particles?	
(d)	**Windows and other openings**	
i)	Are they constructed to prevent the accumulation of dirt?	
ii)	Are those, which can be opened to the outside environment, where necessary, fitted with insect-proof screens, which can be easily removed for cleaning?	
iii)	Are, where open windows would result in contamination, kept closed and fixed during production?	
(e)	Are the doors easy to clean and, where necessary, to disinfect and have smooth and non-absorbent surfaces or appropriate to prevent contamination?	
(f)	**Surfaces (including surfaces of equipment)**	

i)	Are, in areas where food is handled and in particular those in contact with food maintained in a sound condition and are easy to clean and, where necessary, to disinfect?	
ii)	Are these smooth, washable corrosion-resistant and non-toxic materials or appropriate to prevent contamination	
12	Cleaning facilities	
i)	Are adequate facilities provided, where necessary, for the cleaning, disinfecting and storage of working utensils and equipment?	
ii)	Are these facilities constructed of corrosion-resistant materials, easy to clean and do they have an adequate supply of hot and cold water?	
iii)	Do the every sink or other such facility provided for the washing have an adequate supply of hot and/or cold potable water and kept clean and, where necessary, disinfected?	
iv)	Are the cleaning agents and disinfectants are stored separately under lock and key?	
C	**Transport**	
13	Are the conveyances and/or containers used for transporting honey kept clean and maintained in good repair and condition to protect food from contamination and are, where necessary, designed and constructed to permit adequate cleaning and/or disinfection?	
14	Are the receptacles in vehicles and/or containers used for transporting anything other than food where it may result in contamination?	
15	Are the conveyances and/or containers, where used for transporting anything in addition to food or for transporting different foodstuffs at the same time, has effective product separation?	
D	**Equipment requirements**	
16	Are all the articles, fittings and equipment with which food comes into contact	
(i)	effectively cleaned and, where necessary, disinfected at a frequency sufficient to avoid any risk of contamination?	
(ii)	constructed, of such materials and kept in such good order, repair and condition as to minimize any risk of contamination?	
(iii)	with the exception of non-returnable containers and packaging, constructed, of such materials and kept in such good order, repair and condition as to enable them to keep clean and, where necessary, disinfected?	
(iv)	installed in such a manner that does allow adequate cleaning of the equipment and the surrounding area?	
17 (i)	Is equipment, where necessary, fitted with an appropriate control device such as time, temperature, pressure, flow rate, etc. ?	
(ii)	Are the process control equipment and devices calibrated at regular intervals?	
18	Are the chemical additives, where have to be used to prevent corrosion of equipment and containers, used in accordance with good practice?	
E	**Food waste**	
19	Are the non-edible by-products and other refuse removed as quickly as possible from rooms where food is present so as to avoid their accumulation?	
20	Are the non-edible by-products and other refuse deposited in closable containers or any other appropriate foot operable container to prevent contamination?	

21	Are the containers made of an appropriate construction, kept in sound condition, easy to clean and, where necessary, to disinfect? 22 (i)	
Is there	adequate provision made for the storage and disposal of food waste, non-edible by-products and other refuse?	
(ii)	Are the refuse stores are designed and managed in such a way as to enable them to keep clean and, where necessary, free of animals and pests?	
23	Is all waste eliminated in a hygienic and environmentally friendly way in accordance with state pollution control board's consent and does not constitute a direct or indirect source of contamination?	
F	**Water supply**	
24 (i)	Is there documented water management system? Are the outlets identified and serially numbered in the plumbing layout diagram?	
(ii)	Is the water tested as per 98/83/EC or IS:4251 for potability, as applicable?	
25	Is there adequate supply of potable water, which is used whenever necessary to ensure that foodstuffs are not contaminated *(clean water may also be used for external washing)?* What is the method of treatment?	
26 (i)	Is the non-potable water circulated in a separate duly identified system, where it is used for fire control, steam production, refrigeration and other similar purposes?	
(ii)	Is the non-potable water connects with, or allows reflux into, potable water systems?	
27 (i)	Is the recycled water used, if any, in processing or as an ingredient presents a risk of contamination?	
(ii)	Is it of the same standard as potable water, acceptable to the competent authority and will not affect wholesomeness of the foodstuff in its finished form?	
28	Is the steam used directly in contact with food likely to contain substance that presents a hazard to health or likely to contaminate the food?	
29 (i)	Is there appropriate measure to prevent contamination through back suction?	
(ii)	Is water storage tank easily cleanable and protected from outside contamination? State frequency of cleaning water tanks.	
G	**Pest control**	
30(i)	Are adequate documented procedures in place to control pests?	
(ii)	Whether bait map showing serially numbered bait stations provided?	
(iii)	Are adequate procedures in place to prevent domestic animals from having access to places where food is prepared, handled or stored?	
H	**Maintenance**	
31	Is there appropriate maintenance schedule for maintaining infrastructure and equipment facilities and records thereof?	
32	Whether all equipment labelled and marked?	
I	**Training**	
33	Are the food handlers supervised and instructed and/or trained in food hygiene matters commensurate with their work activity?	
34	Have the persons those responsible for the development and maintenance of the procedure for the operation of relevant guides received adequate training in the application of the HACCP principles?	

35	Are the persons those responsible for compliance with the requirements of national law trained?	
J	**Testing facility**	
36	Is there in-house testing facility for analysis of raw materials, in-process samples, finished products, hygiene and sanitation control samples, etc.?	

Section-IV: Any other relevant information:

Section-V: Recommendations of the Inter Departmental Panel (IDP)

The processing establishment may be granted full/conditional approval to process honey for export under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002;

a) for all countries including the European Union (EU) / Countries other than EU
b) for processing (Scope of Approval -Honey which may be allowed to be processed in the establishment)

and
c) with annual installed production capacity of ____

Or

The processing establishment may be granted full/conditional approval to process honey for export under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002, subject to rectification of the minor deficiencies given in the enclosed observation sheet within one/ two/ three months from the date of this assessment and subsequent an on-site verification of the rectifications, by IDP-Convener/ IDP.

Or

The processing establishment may not be approved to process honey for export under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002. The deficiencies observed are given in the enclosed observations sheet. The establishment may apply a fresh after rectification of the deficiencies.

Section VI: Suggestions for improvement, if any:

Signature			
Name			
Place:			
Date			

Annexure IIIB

EXPORT INSPECTION AGENCY - KOCHI / MUMBAI / CHENNAI/KOLKATA/DELHI
(MINISTRY OF COMMERCE & INDUSTRY)
GOVERNMENT OF INDIA
ASSESSMENT REPORT
FOR GMP, GHP, GAP, HACCP, etc.

Name of the processing establishment	: M/s.			
Address of the processing establishment	Address: District: State: Country: India. Ph. Fax: E.mail:			
Address of the Regd. Office	Address: District: State: Country: India. Ph. Fax: E.mail:			
Scope of assessment	: On-site verification to assess implementation of HACCP based food safety management system for processing, handling and storage of Honey			
Date(s) of assessment	:			
Opening Meeting Location and date				
Closing Meeting Location and date				
Name of IDP members	Designation	Organization	Opening Meeting (Sign)	Closing Meeting (Sign)
Name of Representative(s) of establishment	Designation	Organization	Opening Meeting (Sign)	Closing Meeting (Sign)

Section-I: Information about personnel		
1.	Number of technologists/supervisor/chemist and veterinarians available in the establishment	
2.	Are there appropriate personnel qualified, experienced and responsible for developing, implementing and maintaining HACCPbased procedures?	
3.	Are there appropriate qualified and experienced technologist(s) for supervising the processing and other related operations?	

4.	Are there appropriate qualified and experienced personnel for conducting microbiological and chemical analysis?	
5.	Are there appropriate qualified and experienced personnel responsible for processing and handling of food products and maintenance of sanitation and hygiene in the establishment and honey production separately?	
6.	Number of male workers in the processing establishment in each shift .	
7.	Number of female workers in the processing establishment in each shift .	

Section-II: PRIMARY PRODUCTION AND RAW MATERIAL		
A	**Hygiene Provisions and record keeping in Raw Honey Production and handling**	
1.	Are there appropriate actions on account of the results of any relevant analysis carried out on samples taken from the bee keeping farms/collection centres that have importance to human health?	
2	Is there appropriate remedial action when informed of problems identified during official controls?	
3	Are there records of other relevant reports on checks carried out on bee hives/collection centres or raw honey?	
B.	**Other Food Ingredients/additives/preservatives**	
5	Are there controls on procurement of other Food Ingredients, additives, preservatives, etc.?	
6	Is list of the additives/ preservatives furnished?	

Section-III: GENERAL HYGIENE REQUIREMENTS		
A	**Transport**	
1	Are the conveyances and/or containers, where used for transporting anything in addition to food or for transporting different foodstuffs at the same time, has effective product separation?	
B	**Personal hygiene**	
2	Is every person working in a food-handling area maintaining a high degree of personal cleanliness and wearing suitable, clean and, where necessary, protective clothing?	
3	Is person suffering from, or being a carrier of a disease likely to be transmitted through food or afflicted, for example, with infected wounds, skin infections, sores or diarrhoea, permitted to handle food or enter any food-handling area in any capacity, if there is any likelihood of direct or indirect contamination? Are the health cards maintained for all employees?	
4	Does any person so affected and employed in the establishment and who is likely to come into contact with food report immediately the illness or symptoms, and if possible their causes, to the processing establishment?	
C	**Provisions applicable to foodstuffs**	

5	Does the establishment accept raw materials or ingredients, other than food, or any other material used in processing products, even though they are known to be, or might reasonably be expected to be, contaminated with parasites, pathogenic micro-organisms or toxic, decomposed or foreign substances to such an extent that, even after the establishment applies normal hygienic sorting and/or preparatory or processing procedures, the final product would be unfit for human consumption?	
6	Are the raw materials and all ingredients stored in the premises kept in appropriate conditions designed to prevent harmful deterioration and protect them from contamination?	
7	At all stages of production, processing and distribution, is the food protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state?	
D	**Storage conditions**	
8	Are the raw materials, food ingredients, intermediate products and finished products likely to support the reproduction of pathogenic micro-organisms or the formation of toxins, kept at temperatures that might result in a risk to health?	
9	Does the establishment have suitable rooms for manufacturing, handling and wrapping processed foodstuffs, large enough for separate storage of raw materials from processed material?	
10	Are the foodstuffs, where held or served at chilled temperatures, cooled as quickly as possible following the heat-processing stage or final preparation stage when no heat process is applied, to a temperature, which does not result in a risk to health?	
11	Are hazardous and/or inedible substances adequately labelled and stored in separate and secure containers?	
E	**Wrapping and packaging of foodstuffs**	
12	Is the material used for wrapping and packaging a source of contamination?	
13	Are the wrappings and packing materials stored in such a manner that they are exposed to a risk of contamination?	
14	Are wrapping and packaging operations carried out so as to avoid contamination of the products? *(Where appropriate and in particular in the case of cans and glass jars, the integrity of the container's construction and its cleanliness must be assured.)*	
15	Is the wrapping and packaging material re-used for foodstuffs easy to clean and, where necessary, to disinfect?	
F	**Heat treatment**	
16	Is the heat treatment process used to process honey adequate?	
(i)	prevent the product from becoming contaminated during the process?	
17 (i)	Does the process employed achieve the desired objectives?	
(ii)	Are the main relevant parameters (particularly temperature, pressure, sealing and microbiology), checked regularly including by the use of automatic devices?	
18	Does the process used conform to an internationally recognized standard (for example, heat treatment, filtration etc.)?	

Section-IV: REQUIREMENTS CONCERNING PRODUCTS		
A	**Application of the Identification Mark**	

1	Is the Identification mark and details of the approved establishment applied before the product leaves the establishment?	
a)	Are the consignments of honey, destined not for retail but for use as an ingredient in the manufacture of another product, have label giving the temperature at which the honey must be maintained and the period during which conservation may thus be assured?	
2	Is new mark applied to a product after further processing in another approved establishment with the approval number of the establishment where these operations take place?	
B	**Form of the Identification Mark**	
3	Are marks legible and indelible and the characters easily decipherable? Is It clearly displayed for the competent authorities?	
4	Does the mark indicate the name of the country in which the establishment is located?	
C	**Method of Marking**	
5	Is the mark applied directly to the product, the wrapping or the packaging, or printed on a label affixed to the product, the wrapping or the packaging depending on the presentation of different products of animal origin?	
6	Is the mark an irremovable tag of resistant material?	
D	**HACCP-based Procedures** (Hazard analysis and critical control points)	
7	Are the HACCP principles in place, implemented and maintained?	
8	The HACCP principles	
a)	Are the hazards, if any, need to be prevented, eliminated or reduced to acceptable levels identified appropriately?	
b)	Are the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels identified appropriately?	
c)	Are the critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards established appropriately?	
d)	Are the monitoring procedures at critical control points established and implemented effectively?	
e)	Are the corrective actions when monitoring indicates that a critical control point is not under control established?	
f)	Are the procedures, which need to be carried out regularly, to verify that the measures outlined in (a) to (e) above are working effectively, established?	
g)	Are the documents and records commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined in (a) to (f) above established?	
9	Are the procedure reviewed when any modification is made in the product, process, or any step to make the necessary changes to it?	
10	Is the evidence of compliance with HACCP principles furnished to the competent authority?	
11	Are the documents up-to-date at all times?	
12	Are the documents and records retained for an appropriate period?	
13	Traceability of raw honey procurement: Do the procedures guarantee that each supply of raw honey accepted onto premises:	
(a)	Is properly identified?	

(b)	Is accompanied by the relevant information from the holding of provenance controlled / supervised by the processing establishment?	
(c)	Come from a holding or an area subject to a movement prohibition or other restriction for reasons of animal or public health, except when the competent authority so permits?	
(d)	Is clean?	
(e)	Is fit for consumption, as far as the food business operator can judge?	
(f)	is in a satisfactory state?	
14	In the event of failure to comply with any of the requirements listed under point 13 (a to f) above, is it notified to the approved veterinarian/ technologist and took appropriate measures?	
E)	**Food Chain Information**	
15	Does the processing establishment accept raw honey without request and relevant food safety information, contained in the records kept at the holding of provenance, such as;	
(i)	The status of the holding of provenance or the regional animal health status?	
(ii)	the health status of raw honey supplied to the establishment?	
(iii)	Veterinary medicinal products or other treatments administered to the bees/beehives within a relevant period and with a withdrawal period greater than zero, together with their dates of administration and withdrawal periods?	
(iv)	The occurrence of diseases that may affect the safety of honey?	
(v)	The results, if they are relevant to the protection of public health, of any analysis carried out on samples taken from the bee keeping farms/collection centres or other samples taken to diagnose diseases that may affect the safety of honey, including samples taken in the framework of the monitoring and control of bee diseases/parasites and residues?	
(vii)	Production data, when this might indicate the presence of disease?	
(viii)	the name and address of the veterinarian attending the bee keeping farms/collection centres of provenance?	
16	If any lot of raw honey arrives at the processing establishment without food chain information, is it notified to the approved technologist immediately?	
17	Is the raw honey processed without permission of the approved technologist?	

Section-V: SPECIFIC REQUIREMENTS		
A	**Raw Honey Criteria & Handling**	
1	Is the raw honey stored and transported at a temperature, preferably constant, which is best suited to assure optimal conservation of their hygiene properties?	
2	Does the raw honey meet the criteria for chemical contaminants as laid down in the Executive instructions?	
3.	Is raw honey stored in non rusting, lead free,inert, food grade material?	
B	**Honey Processing**	
4	Requirements for Establishments	

(i)	does honey processed in lead free, sufficiently inert and sanitized , containers/equipments processing to eliminate chemical/microbiological hazards or to reduce them to an acceptable level?	
(ii)	Does a batch that has been insufficiently processed undergo processing again immediately in the same establishment, rendering the reprocessing fit for human consumption?	
(iii)	Where a batch is found unfit for human consumption, is it destroyed to ensure that it is not used for human consumption?	
5	Analytical Specifications	
(i)	Is the unit having in-house facilities for inspection and testing?	
(ii)	Is the unit having separate qualified and competent personnel for conducting physical ,chemical and microbiological tests?	
C	**Other Food Ingredients/additives/preservatives**	
6	Whether the Honey complies with the standards as per S.O. 276 (E), 277 (E) both dated 4th march 2002 & S.). 1441(E) dated 19th December 2003	
D	**Finished Honey**	
7	Is the food chain information (traceability) for raw honey procurement, processing and final product maintained	
8	Does the final product mixed with honey from countries other than of Indian origin	

Section-VI: Any other relevant information:

Section-VII: Recommendations of the Inter Departmental Panel (IDP)

The processing establishment may be granted approval to process honey for export under the Export of honey (Quality Control, Inspection and Monitoring) Rules, 2002, in continuation to the conditional approval granted earlier. However, Non - EU approved units if applies for approval to EU, conditional approval is not required.

Or

The processing establishment may be granted approval to process Honey for export under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002, subject to rectification of the minor deficiencies given in the enclosed observation sheet within a maximum period of one month from the date of this assessment and subsequent an on-site verification of the rectifications, by IDP-Convener/ IDP. The conditional approval may be further extended, if required.

Or

The processing establishment may not be approved to process honey for export under the Export of honey (Quality Control, Inspection and Monitoring) Rules, 2002. The conditional approval granted to the establishment may be withdrawn. The deficiencies observed are given in the enclosed observations sheet. The establishment may apply a fresh after rectification of the deficiencies.

Section VIII: Suggestions for improvement, if any:

Signature			
Name			
Place:			
Date			

Annexure IV

EXPORT INSPECTION AGENCY - KOCHI / MUMBAI / CHENNAI/KOLKATA/DELHI
(MINISTRY OF COMMERCE & INDUSTRY)
GOVERNMENT OF INDIA

NON -CONFORMITY REPORT

Name of the Unit :
Scope of visit:

DEFICIENCIES

Signature

Name

Designation

Organization

Date

Fully agree with the observations /recommendations

Signature (representative of the unit)

Name

Designation

Date

Seal of the firm

Annexure V

(Letter of Non approval to process Honey for export to EU/Non-EU)
(format of non-approval letter)

EXPORT INSPECTION AGENCY - _____

No. EIA/ Date : _____

To

Dear Sirs,

Sub: Non approval to process honey for export to EU/Non-EU.

Ref: Your application dated _____.

The Inter Departmental Panel (IDP) of experts visited your processing establishment, particulars of which are given below, for adjudging its suitability for approval under the Export of Honey (QC, I & M) Rules, 2002 for processing of Honey for export to all countries including European Union/Non-EU countries:

Name and Location of the Establishment	Date of IDP Visit

The IDP has observed certain defects/deficiencies in your processing establishment, which are given in the annexure. In view of the nature of defects/deficiencies, it is regretted that your processing establishment cannot be now approved to process honey for export to all countries including EU/ Non-EU countries.

You may, however, rectify all the defects/deficiencies, ensure that your processing establishment meets the above mentioned requirements and apply for approval afresh.

Please acknowledge receipt.

Yours faithfully,

Joint Director I/C

Encl: Annexure

Copy to:

(1) The Officer In-charge
EIA-_____, Sub Office: _____

(2) The Director (I&Q/C), EIC, New Delhi -110 001

Annexure VI

(Letter of Conditional approval to process honey for export to EU/Non-EU

EXPORT INSPECTION AGENCY – _____
(MINISTRY OF COMMERCE AND INDUSTRY)
GOVERNMENT OF INDIA

No. EIA/ Date:

To

M/s. …….
…….

Dear Sirs,

Sub: **Conditional Approval of Honey Processing establishment under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002**

Ref: Your application No. dated

Please refer to your application cited above for approval of your establishment, for processing and packing of honey for export as required under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002

In exercise of the powers conferred by Rule 4.15 of the said Rules, the Panel of Experts visited your establishment on _____to assess the suitability of the infrastructure and equipment facilities for processing honey for export.

After due consideration of the report of the Panel of Experts, your processing establishment has been granted conditional approval under Rule 4.15 of the Export of Honey (QC, I & M) Rules, 2002 to process honey for export. The conditional approval granted to your establishment is valid for a period of three months from _____ up to and including _____as per following details: ,.

1.	Name of the establishment	
a)	Address of the establishment	
b)	Address of the Regd. Office	
2.	Approval No.	
3.	Scope of approval (Items covered)	
4.	Approval granted to export	All countries including EU Non-EU countries only

During the conditional approval you are permitted to process honey meant for export in your approved establishment. However, the export of honey to the EU will be permitted only after approval by EIC. You are requested to apply for approval as soon as your establishment comply with HACCP based food safety requirements and all the activities are operational, so as to arrange a second IDP visit to assess the processing activities and HACCP implementation of your establishment. It shall be ensured that your establishment have production of honey at the time of the IDP visit.

The approval number allotted to your establishment shall be legibly marked on all export packages of honey. The details of identification mark shall comply with the requirements given in the executive instructions. "**Q**" Mark along with approval number shall be legibly printed / labelled on all export packages (master cartons) of honey as required by the Executive Instructions.

Your establishment shall henceforth come under the purview of monitoring by Export Inspection Agency-_____, as under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002 It shall issue "Certificate for Export" for every consignment of honey meant for Non-EU countries. The validity of the "Certificate for Export" issued by the establishment shall be **forty five days** from the date of issuance. A fee @ 0.2% of FOB value shall be paid to EIA for every consignment of honey exported by the unit or through its merchant exporter(s), if any. Certificate for Export meant for **Merchant exporter**, should be got countersigned by the Export Inspection Agency-_____, on payment of fee @ 0.2% of FOB value and service charges of Rs.100/- for each certificate. Certificate blanks are to be obtained from the controlling EIA office at a cost of Rs.20/- per set.

You should open a deposit account and ensure that adequate balance is always maintained in your deposit account with Export Inspection Agency-_____ for payment of monitoring fee and other applicable fee/charges. You should submit the two copies of the "Certificate for Export" to Export Inspection Agency-_____ along with fortnightly statement on the consignments exported and certificates issued, on a regular basis for debiting of the required monitoring fee. The statement should reach EIA office on or before 20th and 5th of every month. **You should also submit statement of honey imported along with statement of consignments exported.**

You are also advised to develop and implement **HACCP based** "**Own Checks**" system and ensure proper maintenance of records. Should you need any health certificate, you should request this office with complete details along with the pink copy of the "Certificate for Export" and all relevant analytical test reports for the consignment.

Please acknowledge receipt.

Yours faithfully,

Agency In-Charge

Copy to :

1. The Director (I & Q/C) EIC, New Delhi - 110 001.
2. The Commissioner of Customs
3. The Officer In-charge, (Sub office concerned)
4. The Additional Director, EIC, New Delhi with a request for updating website
5. Party File ( )

Annexure VII

(Letter of Full approval to process honey for export to EU/Non-EU

EXPORT INSPECTION AGENCY – _____
(MINISTRY OF COMMERCE AND INDUSTRY)
GOVERNMENT OF INDIA

No. EIA/ Date:

To

M/s. …….
…….

Dear Sirs,

Sub: **Approval of Honey Processing establishment under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002**

Please refer to your application for approval of your establishment dated __, for processing and packing of honey for export as required under the Export of honey (Quality Control, Inspection and Monitoring) Rules, 2002.

In exercise of the powers conferred by Rule 4.15 of the said Rules, the Panel of Experts visited your establishment on_____to assess the adequacy of the implementation of HACCP based food safety management system for processing honey for export.

After due consideration of the report of the Panel of Experts, your processing establishment has been granted approval under Rule 4.15 of the Export of honey (QC, I & M) Rules, 2002 to process honey for export. The approval granted to your establishment is valid for a period of one year from _____ up to and including _____ as per following details:

1.	Name of the establishment	
a)	Address of the establishment	
b)	Address of the Regd. Office	
2.	Approval No.	
3.	Scope of approval (Items covered)	
4.	Approval granted to export	All countries including EU Non-EU countries only

You may export honey to countries other than EU. However, the export of honey to the EU will be permitted only after permission of EIC in this regard.

The approval number allotted to your establishment shall be legibly marked on all export packages ofhoney. The details of identification mark shall comply with the requirements given in the executive instructions. "**Q**" Mark along with approval number shall be legibly printed / labelled on all export packages (master cartons) of honey as required by the Executive Instructions.

Your establishment continue to be under the purview of monitoring by Export Inspection Agency-_____, as under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002. It shall issue "Certificate for Export" for every consignment of honey. The validity of the "Certificate for Export" issued by the establishment shall be **forty five days** from the date of issuance. A fee @ 0.2% of FOB value shall be paid to EIA for every consignment of honey exported by the unit or through its merchant exporter(s), if any. Certificate for Export meant for **Merchant exporter**, should be got countersigned by the Export Inspection Agency-_____, on payment of fee @ 0.2% of FOB value and service charges of Rs.100/- for each certificate. Certificate blanks are to be obtained from the controlling EIA office at a cost of Rs.20/- per set.

You should ensure that adequate balance is always maintained in your deposit account with Export Inspection Agency-_____ for payment of monitoring fee and other applicable fee/charges. You should submit the two copies of the "Certificate for Export" to Export Inspection Agency-_____ along with fortnightly statement on the consignments exported and certificates issued, on a regular basis for debiting of the required monitoring fee. The statement should reach EIA office on or before 20th and 5th of every month. **You should also submit statement of honey imported along with statement of consignments exported.**

You are also advised to maintain and review regularly the **HACCP based** "**Own Checks**" system and ensure maintenance proper records. Should you need any health certificate, you should request this office with complete details along with the pink copy of the "Certificate for Export" and all relevant analytical test reports for the consignment.

You should apply to EIA concerned within 60 days from the date of expiry of approval.

Please acknowledge receipt.

Yours faithfully,

Agency In-Charge

Copy to :

1. The Director (I & Q/C) EIC, New Delhi - 110 001.
2. The Commissioner of Customs
3. The Officer In-charge, (Sub office concerned)
4. The Additional Director, EIC, New Delhi with a request for updating website
5. Party File ( )

Annexure VIII

EXPORT INSPECTION COUNCIL OF INDIA

Ministry of Commerce & Industry

Govt. of India

Certificate of Approval

In exercise of the powers conferred by the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002 vide Notification No.S.O.277 dated 4th March 2002, published in the Gazette of India, Extra Ordinary, Part II, Section 3, Sub Section (ii), dated 16.12.2000.

…….

(Name of the establishment)

having their registered office at ……...

……..

(Address of the registered office)

is hereby granted approval/renewal of approval for a period of one year.

valid upto and including……..under approval No……...

for ……..

…….

(Nature of activity of the establishment)

in its establishment situated at ……..

……..(Location of the establishment)

for export to…….

(Name of the importing Country)

subject to the conditions that the establishment should continue to meet the requirements of GOI Notifications No.S.O 277 dated 04.03.2002 published in theGazette of India part II, Section 3, Sub section (ii), dated 4th March 2002/.

Seal of EIC

Place : New Delhi

Date:

Signature :

Name : Rajeev Kher

Designation: Director (I&Q/C)

3rd Floor, NDYMCA Cultural Centre Building, 1 Jai Singh Road, New Delhi:110001

Tel:+ 91-11-23365540, 23748189 Fax: +91-11-23748024

E.mail :eic@eicindia.org

Web: www:eicindia.org

Annexure IX

To

The Joint Director/Deputy Director In-charge
Export Inspection Agency -

Sub: Application for approval of Veterinarian/Technologist.

Sir,

I am a qualified _____(professional qualification) seeking approval of EIA as an approved veterinarian/ technologist for inspection/testing, handling, processing, storage and transportation of honey meant for export. Kindly, find the following details for your perusal. Please also find enclosed copies of qualification certificate, experience certificates,

1.	Name and Residential Address with contact number		:	Mr./Ms.
2.	Educational / Professional qualifications indicating main subject of study (Only degree level and postgraduate qualifications need be shown.) (Attach attested copies of the certificates)		:	
3.	Date of Birth		:	
4.	Present place of posting with approval No. of the processing establishment where presently posted and designation.		:	
5.	Particulars of training undergone in the field of honey processing and/or quality control.		:	
6.	Experience (in number of years) in the field of honey processing/quality control (attach experience certificate)		:	
7.	(a)	Whether previously approved by EIA	:	Yes / No
	(b)	If yes, reference number and date of approval letter (Attach a copy of approval letter)		

Herewith, I declare that the above information is true and correct to the best of my knowledge.

In case, I am approved by EIA, I shall abide to the rules, regulations and executive instructions issued by EIC/EIA and shall carry out all the tasks of the approved veterinarian/ technologist specified, in order to ensure the quality and safety of the honey products, meant for export.

I am enclosing a Demand Draft No. _____dated _____ for Rs._____ drawn on. Bank in favour of Export Inspection Agency- _____ towards assessment fee for approval of the veterinarian/ technologist.

Signature
Name
Designation
Place
Date

Annexure IXA

EXPORT INSPECTION AGENCY - _____

REPORT OF ASSESSMENT OF VETERINARIAN/TECHNOLOGIST

1.	Name and Address of the establishment to which the candidate is attached	}	
2.	Approval No. of the establishment	}	
3.	Name of the veterinarian/technologist	}	Mr./Ms.
4.	Educational/professional qualifications	}	
5.	Experience in honey processing / QC	}	
6.	Date of Assessment	}	
7.	Whether the qualifications and experience are verified	}	Yes / No.
8.	Is this the first approval of veterinarian/ technologist or renewal of the approval?		
	Factors of assessment		**Panel observations**
8.	Ability to supervise honey processing operations	}	
9.	Knowledge of sampling techniques	}	
10.	Knowledge of organoleptic inspection of honey	}	
11.	Knowledge of microbiological testing of honey	}	
12.	Knowledge of chemical testing of honey products	}	
13.	Knowledge of sanitation and hygiene control	}	
14.	Knowledge of HACCP based own checks system	}	
15.	Knowledge of record keeping	}	
16.	Knowledge of honey Notifications and Executive Instructions/ EC directives	}	
17.	Quality Consciousness	}	
18.	Knowledge of regulatory Requirements of importing countries		
19	Any other in formations		

REMARKS/ RECOMMENDATIONS OF THE PANEL OF EXPERTS:

Signature			
N a m e			
Institution			
Date			

Annexure IXB

EXPORT INSPECTION AGENCY – _____
(MINISTRY OF COMMERCE AND INDUSTRY)
GOVERNMENT OF INDIA

Certificate of Approval of Veterinarian/Technologist

(In exercise of the powers conferred by Document No. EIC/Honey -Ex. Instructions./ July 2008 / Issue 2)

Sh./Smt. ..

(Name of the veterinarian/ technologist)

holding...

(Qualification)

and residing at ...

(Residential address)

is hereby approved as a veterinarian/ technologist to handle honey meant for export for a period of two years

valid up to and including ...

subject to the conditions that the performance of the veterinarian/ technologist if found not satisfactory, the Export Inspection Agency-_____reserves the right to withdraw the approval granted to him/her to function as the approved veterinarian/ technologist. Moreover, after the expiry of the validity of the approval, the veterinarian/ technologist shall be reassessed by the IDP for granting fresh approval.

Place: Signature:

Date: (Seal) Name:

Designation:

Annexure X

(APPLICATION FOR APPROVAL OF ADDITIONAL FACILITIES/PROCESSING ACTIVITIES)

From

To

Sir,

Please carry out the assessment of our establishment for additional facilities/ activities as required under the Export of Honey (Quality Control, Inspection and Monitoring) Rules 2002 and also the requirements communicated by EIC from time to time for processing Honey for export.

We furnish below the information regarding the additional facilities/processing activities added in our establishment.

We undertake that our establishment meets the requirements stipulated in Export of Honey (quality Control Inspection and Monitoring) Rules 2002 and also the other requirements specified by the importing countries.

You may please charge fee applicable from our deposit account maintained at EIA.

1. General Information

1.1	Name and address of establishment seeking approval for additional facilities/activities.	
1.2	Processor Code number, allotted by EIA	
1.3	Name of the Chief Executive (MD/MG. Partner/Proprietor) with telephone, fax, E-mail address, if changed.	
1.4	Details of additional facility/activity requested for approval	

2. Construction and layout

2.1	Whether any alteration made in the building and layout? (give details)	
2.2	If so, whether it satisfies the requirements of GoI notification and EU/importing country regulations?	
2.3	Whether walls, floor and roof are smooth and easily cleanable	
2.4	Whether windows, ventilators and doors are made as per norms?	
2.5	Are the lighting and ventilation adequate?	
2.6	Whether adequate washing and sanitizing facilities provided?	
2.7	Is pest control adequate?	

3. Raw material

3.1	Is there any change in the source of raw material procurement?(give detail)	
3.2	If so, whether proper traceability has been established and documented?	
3.3	Whether the quality and safety of the raw material ensured?	

4. Additional facilities

4.1	Specify the additional facilities created with details	
4.2	Whether the additional facilities created are in line with the requirements of GOI notification and EC/importing country regulations?	
4.3	Whether the sanitary and hygienic conditions of the facilities are satisfactory?	
4.4	Is the location of the additional facility suitable for smooth flow of work?	
4.5	Whether adequate precautions have been taken to avoid cross contamination?	
4.6	Whether provisions have been made for cleaning and sanitation?	
4.7	Calibrated temperature recording devices installed where applicable?	
4.8	Whether the installation of the new facility increases the production capacity of the unit?	
4.9	If so what is the expected new production capacity?	
4.10	Whether the new facility has been incorporated in the HACCP manual suitably.	

5. Additional activities

5.1	Specify the additional activities requested for approval with details	
5.2	Whether the additional activities have been properly addressed in the HACCP manual and submitted to the EIA for verification?	
5.3	Whether HACCP is in place?	
5.4	Whether CCPs have been identified and monitored properly?	
5.5	Whether proper raw material, process and product controls are laid down to ensure the safety and quality of the product?	
5.6	Are the employees maintaining good hygienic practices?	
5.7	Whether heating/filtration etc. activities involved for the new facility?	
5.8	If so, are the time/temperature controls properly validated by an approved agency?	

5.9	Whether additional man power is required for the new process activity?	
5.10	If so, give details of number of employees / supervisors/ veterinarian/ technologist recruited	
5.11	Whether additional equipments, machineries required for the new process activity?	
5.12	If so, give details of equipments, machineries erected/ acquired	
5.13	Are the new gauges and thermometers calibrated?	
5.14	Whether calibrated automatic temperature recording devices have been installed where applicable?	
5.15	If additional water are required for processing new product, whether the same are tested as per 98/83/EC/IS:4251?	

6. Any other information.

Yours faithfully,

Signature :

Name :

Designation :

Company seal:

Place:

Dates

Check List of enclosures

1. Authorisation to charge fee applicable from our deposit account maintained at EIA.
2. Up-to-date layout plan of establishment showing alterations made if any.
3. Flow chart of processing operation where applicable.
4. Plumbing diagram (where applicable)
5. Attested copy of potability certificate of water
   (as per the Directive 98/83/EC or, IS 4251) where applicable
6. HACCP manual, where applicable

Annexure XA

EXPORT INSPECTION AGENCY-_____

MINISTRY OF COMMERCE
GOVERNMENT OF INDIA
ASSESSMENT REPORT FOR ADDITIONAL FACILITIES/ PROCESSING ACTIVITIES OF THE ESTABLISHMENT

Name of the processing establishment	: M/s.			
Approval number of the establishment				
Current scope of approval (Name of the products and countries for export)				
Additional scope of approval requested for				
Address of the processing establishment	Address: District: State: Country: India. Ph. Fax: E.mail:			
Address of the Regd. Office	Address: District: State: Country: India. Ph. Fax: E.mail:			
Scope of assessment	: Verification to adjudge suitability of the infrastructure and equipment facilities of the establishment and implementation of HACCP based food safety management system for processing, handling and storage of Honey products pertaining to additional facilities/ activities.			
Date(s) of assessment	:			
Opening Meeting Location and date				
Closing Meeting Location and date				
Name of IDP members	Designation	Organization	Opening Meeting (Sign)	Closing Meeting (Sign)
Name of Representative(s) of the establishment	Designation	Organization	Opening Meeting (Sign)	Closing Meeting (Sign)

1. General Information

1.1	Name and address of establishment seeking approval for additional facilities/activities.	
1.2	Processor Code number, allotted by EIA	
1.3	Name of the Chief Executive (MD/MG. Partner/Proprietor) with telephone, fax, E-mail address, if changed.	
1.4	Details of additional facility/activity requested for approval	

2. Construction and layout

2.1	Whether any alteration made in the building and layout? (give details)	
2.2	If so, whether it satisfies the requirements of GoI notification and EU/importing country regulations?	
2.3	Whether walls, floor and roof are smooth and easily cleanable	
2.4	Whether windows, ventilators and doors are made as per norms ?	
2.5	Are the lighting and ventilation adequate?	
2.6	Whether adequate washing and sanitizing facilities provided?	
2.7	Is pest control adequate?	

3. Raw material

3.1	Is there any change in the source of raw material procurement?(give detail)	
3.2	If so, whether proper traceability has been established and documented?	
3.3	Whether the quality and safety of the raw material ensured?	

4. Additional facilities

4.1	Specify the additional facilities created with details	
4.2	Whether the additional facilities created are in line with the requirements of GOI notification and EC/importing country regulations?	
4.3	Whether the sanitary and hygienic conditions of the facilities are satisfactory?	
4.4	Is the location of the additional facility suitable for smooth flow of work?	
4.5	Whether adequate precautions have been taken to avoid cross contamination?	
4.6	Whether provisions have been made for cleaning and	

	sanitation ?	
4.7	Calibrated temperature recording devices installed where applicable?	
4.8	Whether the installation of the new facility increases the production capacity of the unit	
4.9	If so what is the expected new production capacity ?	
4.10	Whether the new facility has been incorporated in the HACCP manual suitably.	

5. Additional activities

5.1	Specify the additional activities requested for approval with details	
5.2	Whether the additional activities have been properly addressed in the HACCP manual and submitted to the EIA for verification?	
5.3	Whether HACCP is in place?	
5.4	Whether CCPs have been identified and monitored properly?	
5.5	Whether proper raw material, process and product controls are laid down to ensure the safety and quality of the product?	
5.6	Are the employees maintaining good hygienic practices?	
5.7	Whether heating/filtration etc. activities involved for the new facility?	
5.8	If so, are the time/temperature controls properly validated by an approved agency?	
5.9	Whether additional man power is required for the new process activity ?	
5.10	If so, give details of number of employees / supervisors/ veterinarian/ technologist recruited	
5.11	Whether additional equipments, machineries required for the new process activity?	
5.12	If so, give details of equipments, machineries erected/ acquired	
5.13	Are the new gauges and thermometers calibrated?	
5.14	Whether calibrated automatic temperature recording devices have been installed where applicable?	
5.15	If additional water are required for processing new product, whether the same are tested as per 98/83/EC/IS:4251?	

6. Any other information.

Recommendations of the Inter-Departmental Panel (IDP)

Name of establishment and Address	
Approval Number allotted by EIA	
Nature of activities already approved	
Countries to which the above unit is eligible to process	All countries including the European Union (EU) Countries other than EU
Honey, which may be allowed to be processed in the above unit.	
Additional facilities/ activities requested for approval	

The above additional facilities/processing activities of the establishment may not be approved under the Export of Honey (Quality Control, Inspection and Monitoring) rules 2002. The deficiencies observed are given in the attached sheet.

Or

The above additional facilities/processing activities of the establishment may be approved under the Export of Honey (Quality control, Inspection and Monitoring) rules 2002.

Reasons:

Suggestions for improvement, if any:

Signature :			
Name :			
Designation :			
Organisation :			
Date :			

Annexure XI

APPLICATION FOR RENEWAL OF APPROVAL OF ESTABLISHMENT

(*To be submitted in duplicate two months before the expiry of current approval*)

From

……..
……..

To

The Joint Director
Export Inspection Agency - _____

Sir,

The approval granted to our establishment, particulars of which are given below, to process honey for export under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002 may kindly be renewed from the date of expiry of the earlier approval.

You may please charge fee applicable from our deposit account maintained at EIA.

1.	Name and address of the establishment	
2.	Approval Number allotted by EIA	
3.	Date of expiry of current approval	
4.	Address of the registered office of the establishment (If different from the one at Sl. No.1 above)	
5.	Nature of activities for which the establishment is approved and renewal sought	
6.	Approval sought to process honey for export to:	All countries including EU/non-EU countries only
7.	Export during last one year (with details of volume, value, destination etc.)	
8.	Annual Production during the last one year	
9.	No. of complaints received from foreign buyers/importing countries during the last one year (give year wise details)	
10.	Nature of complaints and action taken with details	
11.	Details of changes in the name and in management, of the company if any	
12.	Name of the Chief Executive Officer (CEO)(with Telephone no., Fax, etc.)	
13	Pollution Control Board consent letter Number and its validity.	
14.	Test Report Number, date and name of approved laboratory in respect of water used in the factory.	
15.	Date of review/revision of HACCP manual	
16.	No. of veterinarian/ technologists (approved and non approved)	
17.	Layout changes, if any, during the last one year	
18.	Additional facilities/equipment provided, if any, during the last one year	

19.	Source of raw material used.(Attach the list of identified bee keeping farms/ collection centres)	
20.	Name and Address of the merchant exporter(s) presently catering to	
21.	Name and Address of merchant exporter(s) catered for last one year	
22.	Any other relevant information	

It is hereby testified that the above information is true to the best of my knowledge.

Signature :

N a m e :

Place: Designation :

Date: Company Seal :

Annexure XII

(Reminder letter to units for renewal of approval)

EXPORT INSPECTION AGENCY -_____

No. EIA/ Date:

To

(Name and Address of establishment)

Dear Sirs,

Sub: Renewal of Approval of establishment to process honey for export to EU/non-EU countries

Ref: Approval No. _____, Validity of current approval: Upto _____

The approval accorded to your establishment to process honey for export to EU/non-EU countries will be expiring on the date shown above. If you wish to continue export of honey beyond the date of expiry of the current approval, you will have to seek renewal of approval **at least 75 days before the date of expiry** of current approval. A format of the application for renewal of approval is enclosed for your convenience.

Your application along with relevant documents along with the prescribed fee may please be sent to this office in duplicate **at least 75 days before the date of expiry of the current approval.**

On receipt of your application, arrangements will be made to get your establishment assessed by the Inter Departmental Panel of experts for considering renewal of approval.

Yours faithfully,

Joint/Deputy Director In-charge

Encl: Format of application for renewal of approval

Annexure XIII

EXPORT INSPECTION AGENCY - _____
(Ministry of Commerce, Govt. of India)

ASSESSMENT REPORT FOR RENEWAL OF APPROVAL OF ESTABLISHMENT
(For Infrastructure and Equipment Facilities and HACCP based Food Management System)

Name of the processing establishment	: M/s.			
Approval number of the establishment				
Scope of approval (Name of the products and countries for export)				
Address of the processing establishment	Address: District: State: Country: India. Ph. Fax: E.mail:			
Address of the Regd. Office	Address: District: State: Country: India. Ph. Fax: E.mail:			
Scope of assessment	: On-site verification to adjudge suitability of the infrastructure and equipment facilities of the establishment and implementation of HACCP based food safety management system for processing, handling and storage of honey for renewal of approval of the establishment.			
Date(s) of assessment	:			
Opening Meeting Location and date				
Closing Meeting Location and date				
Name of IDP members	Designation	Organization	Opening Meeting (Sign)	Closing Meeting (Sign)
Name of Representative(s) of the establishment	Designation	Organization	Opening Meeting (Sign)	Closing Meeting (Sign)

1.	**General Information**	
1.1	Name and address of the establishment seeking renewal of approval and official address.	
1.2.	Approval Number	
1.3.	Name of the Chief Executive(MD/Mg. Partner/Proprietor)	
1.4.	Is the processing plant owned or leased by the applicant	Owned / Leased
1.5.	If leased, name of the plant owner, plant name and address:	
1.6.	Expiry date of validity of approval	
1.7.	Nature of activities for which the establishment is approved	
1.8.	Approval sought to process Honey Products for export to (countries)	All Countries including the EU Countries other than EU
1.9.	Additional activities, if any	
1.10	No. of working hours per day	
1.11	No. of working days per week	
2.	**Information on Structure of the Establishment**	
2.1.	Details of Identified bee keeping farms	
2.2.	Details of Honey Collection centers	
2.3.	If not integrated, give address(es) and distance from the establishment	
2.4.	Whether the unit has acquired any additional honey collection centres during last one years.	
2.5.	Whether the honey collection facility is under the control of the establishment?	
2.6 a)	Number and capacity of the storage room/ storage bin(s)	
b)	Number and capacity of the cold Storage(s)	
c)	Number and capacity of rooms for storing finished products	
2.7	Is finished/other storage integrated to the unit?	
2.8	Number of vehicles the establishment has for transportation of raw material, finished product and water. Insulated Vehicle Non - Insulated Vehicle Water tanker	Number Capacity Regn. No.
2.9.	Does the establishment hire outside vehicle?	
2.10.	Whether any structural additions have been made since last approval /renewal of approval? If so, give details: 1. 2. 3.	
3.	**Information about personnel**	
3.1.	No. of approved veterinarian/ technologists	
3.2.	Whether the No. of veterinarian/ technologists adequate?	
3.3	Sl. No. Name of approved Veterinarian/ technologists 1. 2.	Qualifications
3.4.	No. of Supervisors	Pre-processing Processing
3.5.	Total No. of Male Workers	
3.6.	Total No. of Female Workers	
3.7.	No. of work shifts per day	
4.	**Raw Material**	

4.1.	Source of raw material	
4.2.	Mode of transport of raw material from the bee keeping farms/collection centers/honey production holdings	
4.3.	Is there any arrangement for traceability of raw materials?	
4.4	Whether the establishment is controlling the bee keeping farms/collection centers/ honey production holdings properly?	
5.	**Surroundings**	
5.1.	Whether the conditions of approval are still maintained satisfactorily ?	Yes / No
5.2.	If not, what are the deficiencies?	
6.	**Construction and Layout**	
6.1.	Whether the conditions of approval are still maintained satisfactorily?*	
6.2.	If not, what are the deficiencies?	
7.	**Plant facilities:** **Are there adequate facilities for the following?**	
7.1.	Storing inedible material, disinfectants and insecticides	
7.2.	Separate storage for wet and dry items	
7.3.	Storing packaging material	
7.4.	Rest room for workers	
7.5.	Changing room for workers	
7.6.	Vehicle Washing	
7.7.	Water treatment plant	
7.8.	Alarm system to give warning when power fails	
7.9.	Generator	
7.10.	Toilets	
8.	Raw material receiving section	
8.1.	Whether the conditions of approval are still maintained satisfactorily? *	
8.2.	If not, what are the deficiencies?	
9.	**Cold Room/ Storage bin(s)**	
9.1.	Is cold room/ Storage bin(s) provided for storing honey?	
9.2.	Is storage bins lacquered/lead free/food grade material	
9.3.	Is it maintained as required?	
10	**Honey Reception and inspection section**	
10.1.	Whether the conditions of approval are still maintained satisfactorily? *	
10.2.	If not, what are the deficiencies?	
10.3	Whether the unit have separate honey reception section?	
10.4	If so, whether the same meets the requirement?	
11.	**Processing Section**	
11.1.	Whether the conditions of approval are still maintained satisfactorily? *	
11.2.	If not, what are the deficiencies?	
12	**Water**	
12.1.	Whether the source of water and water management system are same as at the time of approval	Yes / No
12.2.	If not, what are the changes and whether these meet the requirements?	
12.3.	Whether water used for processing is tested regularly?	
13.	**Chemicals/Additives**	
13.1.	Whether chemicals and additives, if used, tested/approved and records maintained as required?	
13.2.	If not, what are the deficiencies?	

14	**Heating chambers/Filters**	
14.1	Are the numbers and conditions of heating equipments are the same as per the previous approval?	
14.2	If not, specify the changes observed	
14.3	Are the numbers and conditions of hot chambers, filters are the same as per the previous approval?	
14.4	If not, specify the changes observed	
15.	**Packaging and Storage**	
15.1.	Whether the conditions of approval are still maintained satisfactorily?*	Yes / No
15.2.	If not, what are the deficiencies?	
16	**Toilet Facilities**	
16.1.	Whether the conditions of approval are still maintained satisfactorily?*	Yes / No
16.2.	If not, what are the deficiencies?	
17.	**Personnel Hygiene**	
17.1.	Whether the conditions of approval are still maintained satisfactorily? *	Yes / No
17.2.	If not, what are the deficiencies?	
18.	**Cleaning and Disinfection of Plant, Equipment and Utensils**	
18.1.	Whether the conditions of approval are still maintained satisfactorily?*	Yes/No
18.2	If not, what are the deficiencies?	
19	**Changing Room**	
19.1	Whether the conditions of approval are still maintained satisfactorily?*	Yes/No
19.2	If not, what are the deficiencies?	
20	**Effluent Treatment**	
20.1.	Does the unit have an efficient effluent treatment system?	
20.2.	Does it comply with the statutory requirements? Specify validity of PCB Consent letter	
21.	**Maintenance Schedule**	
21.1.	Whether the documented maintenance procedure is adequate and records of maintenance kept?	
21.2.	If not, what are the deficiencies?	
22	**HACCP-based Procedures** (Hazard analysis and critical control points)	
22.1	Are the HACCP principles in place, implemented and maintained?	
22.2	The HACCP principles	
a)	Are the hazards, if any, need to be prevented, eliminated or reduced to acceptable levels identified appropriately?	
b)	Are the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels identified appropriately?	
c)	Are the critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards established appropriately?	
d)	Are the monitoring procedures at critical control points established and implemented and maintained effectively?	
e)	Are appropriate corrective actions taken when monitoring indicates that a critical control point is not under control?	
f)	Are the measures outlined in (a) to (e) above verified regularly to ensure that the system is working effectively?	
g)	Are the documents and records commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined in (a) to (f) above maintained?	
22.3	Are the procedure reviewed when any modification is made in the product, process, or any step to make the necessary changes to it?	

22.4	Is the evidence of compliance with HACCP principles furnished to the competent authority?	
22.5	Are the documents up-to-date at all times?	
22.6	Are the documents and records retained for an appropriate period?	
22.7	Is the traceability of raw honey accepted onto premise and the honey processed maintained?	
22.8	Whether verification of effective working of HACCP system conducted as per the laid down frequency?	
22.9	Number of internal audits conducted during last one year	
23.	**Rodent / Vermin Control**	
23.1.	Whether the documented rodent/vermin control system is adequate and records maintained?	
23.2.	If not, what are the deficiencies?	
24.	**Transportation**	
24.1.	Are the facilities for transport of raw materials and finished products, and for cleaning and sanitisation of transport vehicles satisfactory?	Yes / No
24.2.	If not, what are the deficiencies?	
25.	**Inspection and Testing**	
25.1.	Are the inspection and testing facilities adequate?	Yes / No
25.2	If not, what are the deficiencies?	
25.3	Is the unit testing all the specified parameters as per the laid down frequency?	
26.	**Training**	
26.1	Whether the food handlers are supervised and instructed and/or trained in food hygiene matters which commensurate with their work activity?	
26.2	Whether those responsible for the development and maintenance of the HACCP have received adequate training in the application of the HACCP principle?	

27. **Recommendations of the IDP**

The processing establishment may be granted renewal of approval to process Honey for export under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2000, for further period of one year from the date of expiry of earlier approval:

d) for all countries including the European Union (EU) / Countries other than EU
e) for processing (Scope of Approval -Honey which may be allowed to be processed in the establishment)

and
f) with annual installed production capacity of ____

Or

The processing establishment may not be granted renewal of approval to process Honey for export under the Export of Honey (Quality Control, Inspection and Monitoring) Rules, 2002. The deficiencies observed are given in the enclosed observations sheet. The establishment may apply a fresh after rectification of the deficiencies.

28 Suggestions for improvement, if any:

Signature			
Name			
Place:			
Date			

Annexure - XIV

EXPORT INSPECTION AGENCY - _____

Statement of Performance of Unit
(for the past one year)

Name and address of the establishment :
Approval No. :
Period of report : From . . . . . till date.

Sl No.				Lab. Test Reports (LR)
(a)	Numbers			
(b)	Overall Performance of the Unit			
(c)	If performance is unsatisfactory, main reasons for it			

Details of complaints from importing country or importer

Number of complaints			On Alert status

Signature of Officer In charge:

Date :

N a m e :

Place :

Designation :

Annexure - XV

(To be typed on company letterhead)

To

The Joint Director-

Export Inspection Agency- _____

Sir,

Sub : Request for permission to process and pack honey for export by merchant exporter.

Ref. : Approval Number of the establishment _____

We request that permission may kindly be granted to us to process and pack honey in our approved processing establishment for export by the following merchant exporter(s).

1) Name and Address of : the merchant exporter(s)

2) Countries to which exports : are proposed to be made

3) Production capacity of the unit : as fixed by EIC/EIA

We hereby state that we, as approved processor, shall be responsible for the quality and safety of the honey processed and packed by us for export by the merchant exporter(s). We also undertake to comply with the directions that may be given in this regard by EIC/EIA ***and assure that the production capacity fixed by EIA for our establishment will not be exceeded at any time.***

We also assure you that honey meant for export by the merchant exporter(s), for which Certificate for Exports are to be issued by us, will only be processed in our approved unit under our control and the products will not be taken out of our control or stored in unauthorised/un-approved places by the merchant exporter(s).

We also undertake that we shall be responsible and liable for any act of omission or commission by the merchant exporter(s) in respect of any quality issue or in respect of any trade related issues including cheating.

Yours faithfully,

Signature :

Name :

Designation :

Company Seal :

Place :

Date :

Encls.

1. Certified true copy of the agreement entered into between the processor and the merchant exporter(s)

2. Declaration from merchant exporter(s) stating that he will abide by the rules and regulations laid down by EIC/EIA .

Annexure XVA

(Letter of permission to process and pack honey for merchant exporter)

EXPORT INSPECTION AGENCY _____
(MINISTRY OF COMMERCE AND INDUSTRY)
GOVERNMENT OF INDIA

No. EIA/ Date :

Dear Sirs,

Sub: Permission to process and pack honey for merchant exporter: M/s. (*Name and address of merchant exporter*)

Ref: Your letter dated

With reference to your letter cited above, you are informed that you are permitted to process and pack honey for export by merchant exporter: M/s. (*Name and address of merchant exporter*), to any country including EU/Non EU countries, subject to the following conditions:

1. The export packages must bear the name, address and approval number of the approved processing establishment and also the name and address of the merchant exporter;
2. The approved processor (M/s. (*Name and address of approved processor*).with processor Code No.) shall be responsible for the quality and safety of the honey processed by it for export by the merchant exporter;
3. The approved processor shall ensure that the consignments of honey processed by it for export by the merchant exporter are not taken out of its control or stored in unauthorised/unapproved premises by the merchant exporter before the actual shipment for export; and
4. The approved processor shall maintain proper records showing the details of honey processed by it for the merchant exporter and such records shall be made available to the monitoring officials of the EIC/EIA for verification.
5. The validity of the permission granted by EIA for processing and packing honey in favour of merchant exporter shall be co-terminus with the validity of the approval of the establishment / validity of the agreement entered between the processor and the merchant exporter, WHICHEVER IS EARLIER.

Please acknowledge receipt.

Yours faithfully,

[ ]
Agency In-Charge

Copy to

(1) The Joint Director, EIC, New Delhi-110001.
(2) The Officer In-charge, EIA-_____, SO: _____.

Annexure XVB

(Letter of Withdrawal of permission to process and pack Honey for export by merchant exporter)

EXPORT INSPECTION AGENCY – _____
(MINISTRY OF COMMERCE AND INDUSTRY)
GOVERNMENT OF INDIA

No. EIA/ Date:

To,

Dear Sirs,

Sub: Withdrawal of permission to process and pack honey for export by merchant exporter.
Ref: (1) Your letter No. dated
(2) Our letter No. EIA/ dated:

In pursuance of your request cited above, the permission given to you to process and pack Honey for the following merchant exporter(s) is hereby withdrawn:

Name and Address of Merchant Exporter

Yours faithfully,

[ ]
Agency In-Charge

Copy to
(3) The Joint Director, EIC, New Delhi-110001.
(4) The Officer In-charge, EIA-_____, SO: _____.

Annexure XVI

MONITORING PARAMETERS FOR WATER (98/83/EC)

S.No.	Parameters
1	Aluminium (Note No.1)
2.	Ammonium
3.	Colour
4.	Conductivity
5.	Clostridium perfringens (including supores) (Note-2)
6.	Escherichia, Coli (E.Coli)
7.	Hydrogen Ion concentration
8.	Iron (Note-1)
9.	Nitrite(Note-3)
10.	Odour
11.	Pseudomonas aeruginosa (Note-4)
12.	Taste
13.	Colony count 22°C and 37°C (Note-4)
14.	Coliform bacteria
15.	Turbidity

Note No.1 Necessary only when used as flocculent
Note No.2 Necessary only if the water originate from or is influenced by surface water
Note No.3 Necessary only when chloramination is used as a disinfectant
Note No.4 Necessary only in the case of water offered for sale in bottles or containers

Annexure XVII

EXPORT INSPECTION AGENCY -_____
MONITORING REPORT

Date of Visit
Name of the Processing Establishment
Approval No.
Product being processed at the time of visit

Sl. No.		Observations/suggestions
(1)	(2)	(3)
General		
1.	Name and Designation of Monitoring officer(s) last visited	
2.	Whether defects pointed out earlier have been rectified by the unit	
3.	Mention deficiencies that are not rectified	
4.	Whether any time frame given for rectification	
5.	Results of samples tested in the previous visit	
6.	Action taken in case of failure of test results	
Facility Checks *(Record observations on the maintenance of infrastructure facilities and sanitary / hygienic conditions at each section mentioned below)*		
1.	Premises	
2.	Raw material receiving area.	
3.	Workers entry points	
4.	Change rooms and toilets	
5.	Honey storage room(s)	
6.	Processing section	
7.	Heat treatment section ,	
8.	Packing section	
10.	Cold storages, other stores	
11.	Machineries/equipments	
12.	Tables and utensils	
13.	Lights and ventilations /AC	
14.	Floor, walls and roof	
15.	Drainage	
16.	Packing material store	
17.	Chemical store	
18.	Water purification system	
19.	hot room facility	
20.	Effluent treatment plant	
HACCP Implementation of the Unit		
1	Whether the identified CCPs monitored properly and recorded?	
2	Whether all control measures are in place?	
3	Whether appropriate corrective actions as stipulated in the HACCP plan taken in case of deviation from Critical limits?	
4	Whether the monitoring and corrective actions, if any, recorded and verified at laid down frequency by the responsible person(s)?	
5	Whether validation is being done regularly?	
6	Whether the instruments used for measurement are calibration periodically?	
7	Whether the HACCP reviewed and amended suitably, if required?	

Own Check system (give details on the following controls exercised by unit)		
1.	Raw Material control	
2.	Process control	
3.	Product control	
4.	Time/Temp control	
5.	Control on additives / preservatives	
6.	Quality management of water	
7.	Calibrations	
8.	Pest control	
9.	Personal hygiene	
10	Raw honey testing for residues as per EIC prescribed frequency	
11.	Maintenance	
12.	Bee Keeping farm control (visit reports)	
Testing and lab practices in the in house laboratory		
1.	Good laboratory practices	
2.	Reliability of testing	
3.	Lab chemicals	
4.	Equipments and utensils of lab	
5.	Calibrations of lab equipments	
6.	Proficiency testing	

Verification of records		
1.	Raw Material records	
2.	Production records	
3.	Heat treatment records	
4.	Packing records	
5.	Storage and transportation records	
6.	Quality control and Inspection records	
7.	Test reports	
8.	Calibrations records	
9.	Sanitary and hygiene records	
10.	Personal hygiene records	
11.	Time/temperature records	
12.	Water test reports	
13.	Disinfections and sanitation records	
Additional Checks (Verify and record the observations)		
1	**Temperature of the Products**	**Product Temp**
a.	Product temperature at different processing stages like heat treatment at melting/moisture removal stage etc.	
b.	Temperature of the honey during storage	
c.	Temperature of the product after heat treatment and stabilisation.	
2.	**Temperature of the facilities**	
a.	Honey storage	
b.	Cold rooms/ Storage bin(s)	
c.	Cold storages	
3.	Time taken or melting honey	

4.	Time taken for filtration	
5.	Moisture content of finished products	
Traceability		
1.	Product tracing from end product to raw material and then to bee keepers	
2.	Traceability for other food ingredient used in case, chemicals & packing material etc.	
Fraud control (Specify if violations are noticed in the following area)		
1.	Misuse of CFEs	
2.	Exceeding capacity limits	
3.	Improper labelling	
4.	Manipulation of records	
5.	Storing of cargo of other establishments without permission	
6.	Processing in unauthorised places	

Details of samples drawn during monitoring		
1.	Sanitation and hygiene control samples including water samples	
2.	Honey Samples for RMP	
3.	Proficiency testing of in-house laboratory	
Any other relevant information		
Recommendations		

- Overall Rating - Satisfactory/unsatisfactory

- Deficiency reported to the establishment
  (As per Non Conformity report)

Signature

Name
Designation
Date

Place

Remarks of the Controlling Officer

Signature

Name
Designation
Date
Place

Annexure XVIIA

EXPORT INSPECTION AGENCY - _____

NON-CONFORMITY REPORT (NCR)

Name of the establishment :

Approval No. :

Nature of inspection :

Date of Visit :

Name and Designation of EIA officer(s)

Name and Designation of the representative of the establishment

1. Earlier ***NCR*** pending for rectification

2. Details of deficiency/non-conformity observed along with the details of the major NCR

3. Comments / Agreed action:

i. Acknowledgement of report copy
ii. Deficiencies/non-conformities have been fully explained and understood by the establishment
iii. Confirmation of agreed or proposed corrective actions to be made to EIA within ……..(7/15/30 etc.) days

Signature	: ……..	Signature :
Name	: ……	Name :
Designation	: ……	Designation :
(EIC / EIA officer)		Representative of the establishment

Note: It is advised that a copy of this report be pasted by the establishment in the establishment inspection register for necessary follow up action and future reference.

Annexure XVIIB

EXPORT INSPECTION AGENCY - _____

SUGGESTIONS FOR IMPROVEMENT

Name of the establishment :

Address :

Approval No. :

Nature of inspection :

Date of Visit :

Name and Designation of EIA officer(s)

Name and Designation of the representative of the establishment

1.
2.
3.
4.
5.

Agreed action by the processor :

Signature : ……..

Name : ……

Designation : ……

(EIC / EIA officer)

Signature :

Name :

Designation :

Representative of the establishment

Annexure XVIIC

BEE KEEPING FARM VISIT REPORT
TO BE SUBMITTED BY PROCESSING UNIT

Date of Visit
Name of the Farm and location
Name and Approval No. of the establishment to which raw honey supplied:

Sl. No.	Requirements	Observations/suggestions
(1)	(2)	(3)
General		
1.	Name and Designation of processing unit officer(s) last visited	
2.	Whether defects pointed out earlier have been rectified by the farm	
3.	Mention deficiencies that are not rectified	
4.	Whether any time frame given for rectification	
5.	Action taken in case of failure of test results	
Hygiene Provisions and record keeping in Raw honey Production and handling		
1	Is the bee keeping farms/honey collection centres/honey production holding owned or contracted by the establishment?	
2	Is the bee keeping farms/ collection centres/honey production holding under supervision/controls of the unit to ensure the wholesomeness of the raw honey procured?	
3	Are there controls to ensure good farming practices and good veterinary practices?	
4	Are there adequate measures to protect raw honey production against any contamination?	
5	Are there adequate measures to control contamination arising from the air, soil, water, feed, fertilizers, veterinary medicinal products and biocides and the storage, handling and disposal of waste in honeys production and associated operations?	
6	Are there controls to prevent use of prohibited antibiotics/ pharmacological substances and Chemicals?	
7	Are there adequate measures relating to animal health and welfare that have implications for human health, including programmes for the monitoring and control of zoonoses and zoonotic agents in honey production and associated operations?	
8	Is there cleaning and where necessary, disinfecting of facilities used in connection with honey production and associated operations, including facilities used to store and handle feed?	
9	Is there cleaning and where necessary, disinfecting of equipment, containers, crates, vehicles and vessels?	
10	Is the water used potable or clean, where necessary, to prevent contamination?	
11	Are the personnel trained on health risks and the personnel, handling foodstuff in good health?	
12	Is there prevention of animals and pests from causing contamination?	
13	Is the waste and hazardous material handled and stored properly to prevent	

	contamination?	
14	Is there prevention of the introduction and spreading of contagious diseases transmissible to humans through food, including taking precautionary measures when introducing new species of bees and reporting suspected outbreaks of such diseases to the competent authority	
15	Are the samples (water, raw honey, etc.) drawn for relevant analyses that have importance to human health and records maintained?	
16	Are there appropriate actions on account of the results of any relevant analysis carried out on samples taken from the bee hives or other samples that have importance to human health?	
17	Is there correct use of veterinary medicinal products?	
18	Is there appropriate remedial action when informed of problems identified during official controls?	
19	Specify the mode of transport of raw honey from bee keeping farm/collection centres /honey production holding..	
20	Are there records relating to measures put in place to control hazards in an appropriate manner?	
21	Are there records of nature and origin of floriculture fed to the bees?	
22	Are there records of veterinary medicinal products or other treatments administered to the bees, dates of administration and withdrawal periods?	
23	Are there records of the occurrence of diseases that may affect the safety of honey?	
24	Are there records of other relevant reports on checks carried out on bees or raw honey?	
25	Are there records of the details of employees such as veterinarians and farm technicians, assisting in raw honey production?	

Any other relevant information
Recommendations

- Overall Rating - Satisfactory/unsatisfactory
- Deficiency reported to the establishment
  (As per Non Conformity report)

Signature
Name
Designation
Date

Place
Remarks of the Controlling Officer
Signature
Name
Designation
Date
Place

Annexure -XVIID

EXPORT INSPECTION AGENCY - ...

SUB OFFICE: ...

FREQUENCY OF MONITORING OF HONEY PROCESSING ESTABLISHMENTS

REVIEW NO.

1	Name of the Establishment	
2	Address of the Establishment	
3	Approval Number	
4	Date of Approval	
5	Current frequency of monitoring and Date of fixation	
6	Period under report	From To
7	Performance of the unit during the period under report based on Monitoring Reports and Lab Test Reports	Satisfactory / Non Satisfactory
8	Details of complaints/rejections, if any, during the period under report from EU/other importing countries	
9	Frequency of monitoring proposed for the unit	
10	Date Signature of the Officer -In charge Name of OIC: Designation: Date:	
11	For use of Head Office Review and approval of frequency of monitoring by In-charge of EIA at Head Office Signature of EIA In- charge Name: Designation: Date:	

Copy to:
The Director (I&QC)
EIC, New Delhi

Annexure - XVIII

EXPORT INSPECTION AGENCY - _____

SUPERVISORY VISIT REPORT

1. Date of visit :
2. Approval No. :
3. Name of the Processing Establishment :
4. Product being processed at the time of visit :
5. Assessment of Unit

Sl. No.	Area	Satisfactory	Details of deficiencies, if observed/ Remarks
1.	Surroundings		
2.	Raw honey Unloading/Receiving area		
3.	Processing Section		
4.	Personal Hygiene		
5.	Change Room		
6.	Steam, if used		
7.	Cold Room/storage bin(s)		
8.	Heat treatment		
9	Water/Chemical/Additives		
10.	Cold Storage/ dry storage		
11.	Rodent/Vermin Control		
12.	Effluent Treatment		
13.	Own Checks/HACCP system		
14.	Maintenance of records		
15.	Packaging/Storage/Transportation		
16.	Inspection and Testing Facilities		
17.	Any other relevant information i) Quality of the monitoring ii)Area of focus in which detailed assessment was done		

6. MVs since last SV :

Sl. No.	Date	MvO	Satisfactory / Unsatisfactory	Lab. Results	Deficiencies observed	Action by Processor

7. Results of Water :
8. Recommendations :

⇒ Overall Rating - Satisfactory / Unsatisfactory

⇒ ***NCR***

Signature :
N a m e :
Designation :
Date : Place:

Remarks of the Agency In-charge

Signature :
N a m e :
Designation :

Date : Place:

Note: Monitoring Visit (**MV**) - supervisory Visit (**SV**) - Monitoring Officer (**MvO**) - Non-Conformance Report (NCR)

Annexure XIX

EXPORT INSPECTION COUNCIL
(MINISTRY OF COMMERCE)
GOVERNMENT OF INDIA

CORPORATE AUDIT REPORT

1.	Auditee	
2.	Dates of Audit	
3.	Activity under Audit	
4.	Scope of Audit	
5.	Audit Team	
6.	Audit Schedule	
(i)	Opening Meeting	
(ii)	Closing Meeting	
7.	Observations	
8.	Non Conformities	
9.	Any other Remarks	

7. OBSERVATION FORM

S.No.	Element	Observation	Reference
1			
2.			
3.			
4.			

8. NON-CONFORMITY REPORT (NCR)

S.No.	Non-Conformity observed	Doc.Ref	Type of NC Major/Minor
1.			
2.			
3.			
4.			

9. General Observations

1	
2	
3	
4.	
5.	
6.	

Team Leader Auditor
Proposed Corrective actions
Probable Date of Completion

Auditee

NC cleared/down graded/statuesque

Auditor

Date

Team Leader

Annexure XXA

MODEL HEALTH CERTIFICATE FOR IMPORTS OF HONEY AND OTHER APICULTURE PRODUCTS INTENDED FOR HUMAN CONSUMPTION

COUNTRY **Veterinary certificate to EU**

Part I: Details of dispatched consignment

I.1. Consignor
Name
Address
Postal code
Tel No.

I.2. Certificate reference number | I.2.a.

I.3. Central Competent Authority

I.4. Local Competent Authority

I.5. Consignee
Name
Address
Postal code
Tel No.

I.6.

I.7. Country of origin | ISO code | I.8.

I.9. Country of destination | ISO code | I.10.

I.11. Place of origin
Name
Address

I.12.

I.13. Place of loading

I.14. Date of departure

I.15. Means of transport
Aeroplane ☐ Ship ☐ Railway wagon ☐
Road vehicle ☐ Other ☐
Identification:
Documentary references:

I.16. Entry BIP in EU

I.17.

I.18. Description of commodity

I.19. Commodity code (HS code)

I.20. Quantity

I.21. Temperature of product
Ambient ☐ Chilled ☐ Frozen ☐

I.22. Number of packages

I.23. Identification of container/Seal number

I.24. Type of packaging

I.25. Commodities certified for
Human consumption ☐

I.26.

I.27. For import or admission into EU ☐

I.28. Identification of the commodities

Species (Scientific name)	Treatment type	Approval number of establishments: Manufacturing plant	Number of packages	Net weight

COUNTRY **Honey and apiculture products**

Part II: Certification

II	Health attestation	II.a Certificate reference number	II.b

I, the undersigned, declare that I am aware of the relevant provisions of Regulations (EC) No 178/2002, (EC) No 852/2004 and (EC) No 853/2004 and certify that honey and apiculture products described above were produced in accordance with those requirements, in particular that they:

— come from (an) establishment(s) implementing a programme based on the HACCP principles in accordance with Regulation (EC) No 852/2004,

— have been handled and, where appropriate, prepared, packaged and stored in a hygienic manner in accordance with the requirements of Annex II to Regulation (EC) No 852/2004

and

— the guarantees covering live animals and products thereof provided by the residue plans submitted in accordance with Directive 96/23/EC, and in particular Article 29 thereof, are fulfilled

Notes

Part I

— Box reference I.11: Place of origin: name and address of the dispatch establishment.
— Box reference I.15: Registration number (railway wagons or container and lorries), flight number (aircraft) or name (ship). Separate information is to be provided in case of unloading and reloading
— Box reference I.19: Use the appropriate HS codes: 04.09, 04.10
— Box reference I.23: Identification of container/seal number: only where applicable.

Part II:

— The colour of the stamp and signature must be different to that of the other particulars in the certificate.

Official inspector

Name (in capitals):
Date
Stamp

Qualification and title:
Signature:

Annexure XXB

Book No. **HEALTH CERTIFICATE** Sl. No.

(For Non EU countries)
For Honey intended for export

Country of despatch: **India**
Competent Authority: Export Inspection Agency-Bombay/Calcutta/Cochin/Delhi/Madras
Reference No. of export certificate (issued by Processing Plants):

1. **Details identifying the Honey**
   Description
   Quantity
   Type of Packaging
   No. of packages
   Temperature required during storage and transport
   Manufacturing Date
   Expiry Date

2. **Provenance of Honey**
   Address(es) and number(s) of preparation or processing plant(s) authorised for exports by the competent authority

   Approval No. of the plant(s)

3. **Destination of the Honey**
   The Honey is to be despatched
   From …… (Place of despatch)
   To …… (country and place of destination)
   By the following means of transport
   ……..
   Name of address of consignor

   Name of consignee and address at place of destination LC Details

4. **Health Attestation**

   It is hereby certified that the Honey described above have been handled, processed, stored and transported under hygienic conditions as laid down in the Export of Honey (Quality Control, Inspection & Monitoring) Rules, 2002 and found conforming to laid down standards and fit for human consumption and the plant, where the honey have been processed, is approved and regularly monitored by the Export Inspection Agency (Competent Authority)

   Place of issue: Signature of authorized officer
   Date of issue Name :
   Designation

   Seal

Annexure XXC

(Public Health attestation to be submitted by the establishment)

(To be typed on the letterhead of the approved establishment)

To Whom It May Concern

I, the ***approved veterinarian/ technologist*** of Ms/ _____(name of the organization with address), hereby certify following for the export of honey detailed in the Certificate for Export no._____ dated _____that

Public Health attestation:

The honey described above

a) was manufactured from raw honey
   1. not according to the findings of monitoring plans at least equivalent to those provided for in Directive 96/23/EC containing residues of chemical substances in excess of the limits laid down in Annexes I and III to Regulation (EEC) no. 2377/90, as amended.,
   2. not, according to the findings of monitoring plans at least equivalent to those provided for in Directive 96/23/EEC, containing pesticide residues in excess of the maximum levels laid down in Annex-II to Directive 86/363/EEC, as amended,
   3. not, according to the findings of monitoring plans at least equivalent to those provided for in Directive 96/23/EEC, containing contaminants in excess of the maximum tolerances laid down in the Community list provided for in (EEC) No. 1530/2002.
   4. Which was obtained, collected, stored and transported in accordance with the specific hygienic conditions laid down in Regulation 852/2004 and implementing HACCP principles,.

b) comes from a treatment establishment and/or processing establishment offering equivalent guarantees to those plan submitted in accordance with Directive 96/23/EC shown on the list of establishments authorized to export to the European Community and which is subjected to supervision by the competent authority in accordance with the provisions of regulation 852/2004.

c) has undergone, treatment prior to import into the territory of the community and complies to EC directive 110/2001/EC:

d) has been wrapped, packaged & labeled in accordance with Directive 2000/13/EC & Regulation 852/2004;

that I am aware of the provisions contained in Directive 92/46/EEC, Annexes I & III to Regulation (EEC) No. 2377/90, Annex I &II to Directive 2001/110/EEC.

(Signature)

(Name and designation Seal)

Place:
Date:

Annexure XXD

(Request letter from the establishment for health certificate)

(To be typed on the letterhead of the approved establishment/processor)

Date:

To,

The Joint Director
Export Inspection Agency_____

Sir,

Sub: Request for issuance of Health Certificate for Export of Honey to EU / Non-EU as per requirement of the importing country

Ref: 1) Our approval number_____
2) Certificate for Export No._____ dated _____ for Export to_____ (Country)

In connection with the above subject, we hereby submit a the details of the information required by the importing country in the health certificate for the purpose of issuance of Health Certificate for Export of Honey.

Herewith, I submit that the information furnished is true and correct to the best of my knowledge and the honey meant for export as detailed in the Certificate for Export cited under reference, is free from any hazardous substances and fit for human consumption.

Please debit the prescribed fee from our deposit account maintained at EIA and issue the Health Certificate for the consignment.

Yours faithfully,

(Authorized signatory)

Encl:

1. The information in the prescribed public health certificate as required by the importing country
2. Certificate for export (pink copy) No. _____dated_____
3. Invoice copy No
4. Certificate of analysis

Annexure XXI

CERTIFICATE FOR EXPORT

1. Name and Address of the Exporter	4. Buyer's Order No. & Date	5. VALID FOR CUSTOMS
2. Name and Address of the Approved Processing Plant	6. Invoice No. & Date	7. Country of destination
3. Details of stamp on export packages		
Approval No.		8. Certificate No. Valid Upto and including .....
9. Specification Reference		

10. Shipping marks	11. No. and kind of Pkgs.	12. Description of Goods	13. Quantity	14. FOB value

15. DECLARATION

The undersigned hereby declares :

(i) that the above consignment has been processed in our processing plant which has valid approval and is under continuous monitoring by Export Inspection Agency - as per the Export of Honey (Quality Control, Inspection & Monitoring) Rules, 2002

and

(ii) that the consignment is exportworthy.

Seal of the Processing Plant

(Signature)

(Name)

(Designation)

Place ..... Date .....

Annexure XXIA

FORTNIGHTLY STATEMENT ON CERTIFICATES ISSUED FOR EXPORT OF HONEY FOR THE PERIOD FROM _____ to _____

Name of the processor :

Approval Number :

A. Details of certificates issued for direct exports and on account exports

Certificate for Export No.	Date of issue	Commodity	F.O.B. Value (Rs.)	Invoice No. and Date (Enclose copy)	If on account Exports, the name and Address of the export house	Remarks

B. Details of certificates issued for exports through Merchant Exporters

Certificate for Export No.	Date of issue	Commodity	F.O.B. Value (Rs.)	Invoice No. and Date (Enclose copy)	Name and Address of Merchant Exporter	Remarks

C. Details of certificates cancelled, if any

Certificate for Export No.	Reasons for Cancellation	Remarks
		Full set of cancelled certificates enclosed.

N.B. Pink copy of the certificates numbering _____ is enclosed.

D. Details of Honey imported from other countries, if any

Importing Country	Imported Quantity	Area of sale within India with Quantity	Area of Sales if outside India with Quantity

Signature :

Place : Name :

Date : Designation :

(Company seal) :

To

The Officer in-charge

Export Inspection Agency - _____

Sub Office;

Annexure XXII

(On the letter head)

INDEMNITY BOND

We solemnly declare that the Certificate for Export (blank) with Serial No: ... ... Book No : ... ..issued to us by Export Inspection Agency ..... has been lost/ misplaced without having been utilised for export of goods and the said certificate ,if traced latter, will not be utilised for export of any consignment, but will be surrendered to the Export Inspection Agency... .. for cancellation.

We further declare that we are fully liable for any action in the event of the misuse of such certificate either by us or on account of us and we agree to keep the Export Inspection Agency indemnified in case of misuse or illegal use of such certificate

Witnesses
1.
2.

Signature:
Place: Name and Designation
Date: Seal of the Company:

Annexure XXIII

EXPORT INSPECTION AGENCY - ...

Monthly report of supervisory / monitoring visits to the EU/ Non EU approved Honey establishments for the month of...

Sl.no	Action taken	EU		Non- EU	
		Supervisory	Monitoring	Supervisory	Monitoring
1	Number of visits planned				
2	Number of visits actually conducted				
3	Number of units which are satisfactory based on the visits				
`4	Number of units which are unsatisfactory based on the visits				
5	Reasons for short fall, if any in supervisory /monitoring visits				
6	Action taken in case of each unsatisfactory unit				
7	Details of verification of corrective action taken by the processing units reported unsatisfactory in the earlier statements.				
8	Any other information				

Place :

Signature :

Date :

Name :

Designation:

Annexure XXIV

EXPORT INSPECTION AGENCY - ...

(CHANGES IN THE LIST OF APPROVED UNITS (EU AND NON- EU) AS ON... ...)

SL.NO	AP.NO	NAME AND ADDRESS OF ESTABLISHMENT	ADDRESS OF REGISTERED OFFICE	EU OR NON -EU	DATE OF INITIAL APPROVAL	VALID. OF APPRO L UP TO AND INCLUDING
(1)	(2)	(3)	(4)	(5)	(6)	(7)

Annexure XXV

Export Inspection Agency-------

Details of samples failed during monitoring of EU approved Honey units for the month-------

S.NO.	Name of the unit with Ap.no.	Products from which samples drawn	Date of sampling	Name of the lab	Parameters failed	test results	Test methods /detection level	Specified levels	Actions taken
1	2	3	4	5	6	7	8	9	10

Annexure XXVI

EXPORT INSPECTION AGENCY----------

Status Report on Honey Establishment, which had complaint from importing country.

As on _____(date)

1.	**Name and Address of the Honey establishment**	
2.	**Approval No.**	:
3.	**Details of Complaints**: (a) Nature of complaint (b) RASFF Notification (c) Product (d) Health Certificate No. (e) Complaint Country	
4.	**Date of placing the unit' On Alert'**	:
5.	**Current Status and Location of the consignment** in question a) Whether the consignment has been brought back to India b) If brought back, details of tests ◴ Test results by EIA ◴ Test results by other lab ◴ Action taken, if any c) If not brought back, status of the consignment	
6.	**Assessment of the establishment** a) Date of assessment b) Composition of assessment team c) Outcome of the Assessment • Whether the unit meets the conditions specified in GOI Notification/other requirements • Implementation of HACCP • Routine testing by the unit • Traceability and the source of raw material used for the consignment in question. • Corrective action suggested/implemented, if any. • Whether the consignment has been tested prior to shipment for the contaminant(s)_ in question (if so, give details) • Test results of samples drawn during assessment (with details like number of samples, test methods, name of the Lab etc.	
7.	**Current status of Sanitation/Hygiene of the unit(after placing the unit ' on alert')** • No. of Monitoring Visits (MV) conducted • No. of Satisfactory MVRs including Lab reports • No. of unsatisfactory reports with details of non-compliance	
8.	**Details of consignment inspection tested (with details of testing method, Lab etc.)** ③ No. of consignments tested ③ No. of consignments passed ③ No. of consignments failed ③ Reason for failure/other remarks	
9	**Present status:** • Date of recommendations to EIC to send recommendation to the foreign health authority • Change in Frequency of Monitoring (F.M.), if any • Date of recommendation to EIC to lift 'on alert' • Date of Revocation of 'on alert' and EIC reference	
10	Action pending	

Signature

(Name and designation)

Annexure XXVII

An application for consignment wise inspection

Exporter's Name Address 1	Invoice No. & Date 10	Exporter's Ref 11	
	Buyer's Order No. & Date 12		
Manufacturer's Name & Address 2	To 13 The (Name & Address of the Inspection Authority)		
Details of the Manufacturer's Seal, if any 3 Approval No.	Please inspect the consignment and issue a Certificate of inspection under the ……Act. A crossed cheque for Rs. …… drawn on…… is enclosed as inspection fee/Please debit our Account Pass Book No. …… enclosed. Date Signature of Exporter		
Inspection required on 4	Weekly Holiday 5	Address where consignment is to be inspected 14	
Vessel/Flight No. 6	Port of Loading 7		
Probable date of landing 8	Date of Sealing/Flight 9		

Marks & Nos. 15	No. & Kind of Pkgs. 16	Description of Goods(*) 17	Quantity 18	FOB Value (in Rs) 19

Technical requirements including specifications/approved samples with its characteristics as stipulated in the export contract. 20

Other Relevant Information 21

Declarations: Certified that the goods mentioned above have been manufactured/produced to satisfy the conditions relating to quality control/inspection 22 applicable to them under the ----------Act and that consignment conforms to the specification Certified that the goods have been offered previously for inspection vide intimation no. …….. Dated ……. and the defects as pointed out earlier have been duly rectified.

Certified that no additional technical or quality requirements other than mentioned above have been stipulated by the overseas buyer.

Signature & Date

(*) Description should include grade, size and brand, if any. @ As motor car parts, Components and accessories are covered under statutory pre-shipment inspection, exporter in this case would need to prefix the description of goods reproduced from Master Document-1 by typing "Components and Accessories fitted in" and fill in the quantity column accordingly.

Annexure-XXVIII

SAMPLING OF HONEY

1. GENERAL REQUIREMENTS

1.0 In drawing, preparing, storing and handling samples, the following precautions and directions shall be observed.

1.1 Samples shall be taken in a protected place not exposed to damp air, dust or soot.

1.2 The sampling instrument shall be clean and dry when used.

1.3 Precautions shall be taken to protect the samples, the material being sampled, the sampling instrument and the containers for samples from adventitious contamination.

1.4 The samples shall be placed in clean and dry glass containers. The sample containers shall be of such size, that they are almost completely filled by the sample.

1.5 Each container shall be sealed air-tight after filling and marked with full details of sampling, code number and other important particulars of the consignment.

1.6 Samples shall be stored in such a manner that the temperature of the material does not vary unduly from the normal temperature.

2.0 SCALE OF SAMPLING

2.1 Lot

All the containers in a single consignment belonging of the same grade of material shall constitute a lot. If the consignment is declared to consist of different grades of material, the containers belonging to the same grade shall be grouped together and the groups of containers of the same grade in a consignment shall constitute separate lots.

2.1.1 Samples shall be tested from each lot for ascertaining its conformity to the requirements of this specification.

2.2 The number of containers to be selected from each lot shall depend on the size of the lot and shall be done in accordance with col 1,2 and 3 of Table 1.

Table Number of Containers to be Selected for Sampling
(Clause 2.2)

Lot Size (N)	**No. Of Containers to be Selected (n) for Size of Container**	
	500 g and Above	Below 500 g
(1)	(2)	(3)
Up to 25	3	6
26 to 150	4	6
151 to 500	5	9
501 and above	7	12

2.3 The containers shall be at random from the lot.

3. TEST SAMPLES

3.1 Preparation of Test Samples

Draw with suitable sampling instrument equal quantities of the material from different parts (top, middle, bottom, etc) of the container till about 1 kg of the material is drawn; divide it into two equal parts. Each part so obtained shall constitute an individual sample representing the container and shall be transferred immediately to thoroughly cleaned, dry containers, sealed air-tight, and marked with particulars given under 1.5. Two individual samples so obtained from each container shall be made into sets in such a way that each set has a sample representing each selected container. One of these shall be marked for the exporter/processor, another for the EIA.

Annexure XXIX

CERTIFICATE OF INSPECTION/EXPORT

Exporter's Name Address 1			Invoice No. & Date 6		
			Buyer's Order No. & Date 7		
Manufacturer's Name & Address 2			8 **EXPORT INSPECTION AGENCY-KOLKATA/KOCHI/DELHI/MUMBAI/CHENNAI** (Ministry of Commerce) Government of India Address of the concerned EIA		
Details of the Manufacturer's Seal, if any 3 Approval No.			Valid up to and including----------		
Details of Seal of Inspection authority, if any 4			Certificate no. 9		
Specification Reference 5					
Marks & Nos. 10	No. & Kind of Pkgs. 11	Description of Goods(*) 12	Quantity 13	FOB Value (in Rs) 14	
Remarks, if any		Stamp for FOB value		15	

** CERTIFICATION UNDER INSPECTION SYSTEM

It is hereby declared that the consignment as per details given above has been inspected as required under the Honey Export (Quality Control & Inspection) Rules 2002.

It satisfies the conditions as applicable to it and is certified export worthy.

Date of Inspection……..

SEAL OF THE ISSUING AUTHORITY

Signature
Name

Designation Accordance with the standard

Date

(*) Description should include grade, size and brand, if any. @Refer to footnote in 'Intimation for Inspection). (**) Strike out whichever is not applicable

Annexure XXX

CERTIFICATE OF REJECTION

EXPORT INSPECTION AGENCY _____

NO. EIA/

To
M / S._____

Sub : **Pre shipment Inspection of _____**

Ref : **Your Intimation No. _____dated _____**

Dear Sirs,

With reference to your above mentioned intimation for inspection, this is to inform you that the consignment of _____ was inspected and it was not found conforming to the specification recognized under Honey Export (Quality Control, Inspection and Monitoring) Rules, 2002. It is, therefore, regretted that the certificate of export worthiness cannot be issued due to the following reason (s).

Reason (s) for rejection

1)

2)

3)

4)

5)

Yours faithfully,
For **Export Inspection Agency,**

Note: Seals if any affixed in the consignment may be returned to this office immediately.

Annexure XXXI

PROFORMA OF TEST REPORT OF HONEY

Sl.No._____ **Date of Analysis**:_____ **Code No.**_____

A	**Notified Tests**	**Weight**	**Percentage**
	1. General Characteristics	…….	…….
	2. Composition and Quality	…….	…….
	(a) Reducing Sugar Content (Min)		
	(b) Moisture content (Max)		
	(c) Fructose/Glucose (Min)		
	(d) Water insoluble solids content		
	(e) Mineral substance (ash)		
	(f) Sucrose		
	(g) Acidity		
	3. Diatase activity (Schade Scale)	…….	…….
	4. Hydroxymethyl furfural content (HMF)	…….	…….
	5. Colour	…….	…….
	6. Food additive	…….	…….
	7. Veterinary drug, other substances, environmental and other contaminants	…….	…….
	8. Freedom from foreign matter	…….	…….

Signature of Analyst:_____
Date

The sample conforms/does not conform to the trade

Assistant Director : _____

Deputy Director: _____
Date :_____

Annexes: Residue Monitoring Plan (RMP)

TRADE NOTICE: APEDA/QMC/GEN/038/2006
DATED: MARCH 31, 2006

RESIDUE MONITORING PLAN FOR 2006 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, are 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.

Keeping this in view, some importing countries, for instance, 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, recognised 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 and National Referral Laboratory (NRL) for the purposes of sampling and testing is given in Annexure-1.
		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 and pesticides is 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.
		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	The processing units have the responsibility to inform the nominated laboratory by e-mail/ fax in advance or on arrival of all consignments of raw honey at their unit.
		3.10	Laboratories shall, within 48 hours of such communication to the nominated laboratories, visit the units for drawl of samples. Units shall not process such raw honey until receipt of report.
		3.11	The laboratories will draw batch-wise samples from the raw and processed/packaged honey meant for exports.
		3.12	Samples from all batches of processed/ packed honey shall be drawn for testing.

		3.13	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 bimonthly statement of samples tested to APEDA, NRL and EIC in Annexure-8. In case, the samples exceed the MRLs permitted, the nominated laboratory will immediately bring it to the notice of NRL, EIC and APEDA.
		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.
		4.8	The nominated laboratories shall communicate the details of the samples drawn for analysis to the NRL so that the NRL can draw 5% samples as per procedure given in para 5.1 of Annexure-3.
5.	Responsibilities of National Referral Laboratory (NRL)	5.1	The National Referral Laboratory 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 the documents of 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 National Referral Laboratory 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 and processors.
		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 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.

		5.13	The NRL will conduct random checks of the records of EIC/EIA with regard to the work carried out by them under para 7.4.
6.	Powers of National Referral Laboratory	6.1	The NRL shall have the right to draw samples from honey collection enters, 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 bimonthly 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 and pesticides and the prescribed residue levels.
		7.6	To keep APEDA and NRL informed of any EU notifications or changes in the MRLs of residues of drugs and pesticides.
		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 3.13 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 31, 2006
Place: New Delhi

(K S Money)
Chairman - APEDA

ANNEXURE - 1

LIST OF NOMINATED LABORATORIES

Sl. No.	Name and address of the laboratory	Status and sampling
1.	Regional Research Laboratory Canal Road, Jammu Tawi - 180001 Tel: 0191-2549084, 2549051 Extn: 227 Fax:0191-2543829 E-mail: **agarwalsg@yahoo.com** Contact Person : Dr. S G Agarwal, Scientist-F	National Referral Laboratory
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	1. M/s. Kashmir Apiaries 2. M/s. M B Exim (P) Ltd.
3.	Delhi Test House A-62/3, 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	1. M/s. Shakti Impex 2. M/s. Little Bee Impex
4.	Arbro 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.)	1. M/s. Apis India Natural Products 2. M/s. Beez India Natural Products

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 exceed 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.

3.4 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 sample 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

Months	Apis		Shakti		Beez India		Kashmir		Little Bees		M. B. Exim	
	Raw	Proc	Raw	Proc	Raw	Proc	Raw	Proc	Raw	Proc	Raw	Proc
Apr'06	6	5	2	1	2	1	9	4	6	6	3	3
May'06	6	4	2	1	2	1	9	3	6	4	3	2
June'06	1	4	1	1	1	1	1	3	1	4	1	2
July'06	1	4	1	1	1	1	1	3	1	4	1	2
Aug'06	1	4	1	1	1	1	1	3	1	4	1	2
Sep'06	1	4	1	1	1	1	1	3	1	4	1	2
Oct'06	1	4	1	1	1	1	1	3	1	4	1	2
Nov'06	9	4	3	1	2	1	13	3	8	4	4	2
Dec'06	9	5	3	1	2	1	13	4	8	6	4	3
Jan'07	9	5	3	1	2	1	13	4	8	6	4	3
Feb'07	9	5	3	1	2	1	13	4	8	6	4	3
Mar'07	9	5	3	1	2	1	13	4	8	6	4	3
Total	62	53	24	12	19	12	88	41	57	58	31	29

Total number of samples: 486

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 2006	:
08.	Variety (region flora specific)	:
09.	Name of Medicines etc. used	:
10	Date of administering	:
11.	Dose, concentration administered	:
12.	Means of harvest/primary extraction	:
13.	Means of storage of raw honey	:
14.	Means of transport to the honey processing unit	:
15.	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)	Region/State 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 • Vinclozolin	 ppb ppb ppb ppb ppb ppb ppb ppb ppb ppb ppb	 20 5 25 25 25 25 5 5 5 10
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 • **Arsenic** • **Tin**	 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

BI-MONTHLY STATEMENT TO NATIONAL REFERRAL LABORATORY, APEDA & EIC
(TO BE SUBMITTED BY THE NOMINATED LABORATORIES)

Date :

Period of Testing :

Name of the unit/ Exporter Address	Date of Sampling	Batch No.	Area/ Region	Nature of sample	Date of comple-ion of Testing	Results (conformed or not conformed) as per EU requirements	Remarksin case of non-confor-mance

Signature of Authorized Signatory of
Nominated Laboratory

ANNEXURE-9

QUARTERLY CONSOLIDATED STATEMENT OF TEST REPORTS
(TO BE SUBMITTED BY NRL TO APEDA AND EIC)

1) Report period
2) Name and address of the unit
3) Products
   c) Raw honey
   d) Processed honey
4) Lot / Batch number
5) Batch size
6) Number of samples tested
7) Sampling procedure followed

S.No	Name of drugs and pesticides	Resi-due levels found	MRLs as per EU	Method of testing	Limit of Detection	Comp-liances	Non comp-liances	Remarks

Place:
Date :

Signature of the Authority of
National Referral Laboratory

ANNEXURE-10

INTERNAL ALERT INFORMATION

(TO BE ISSUED BY NATIONAL REFERRAL LABORATORY)

Tel: 0191-549084,549051,Fax:0191-548607
e-mail: rrlj@nde.vsnl.net.in

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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