SCHEME FOR RECOGNITION

OF

HACCP

IMPLEMENTATION AND

CERTIFICATION AGENCIES



Agricultural and Processed Food Products
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Document No: APEDA/QMC/HACCP.RECG/2004

DATE: 24th September 2004

SCHEME FOR RECOGNITION OF HACCP IMPLEMENTATION AND CERTIFICATION AGENCIES

1.0 INTRODUCTION

With an increased awareness of production through various production techniques and processes, the consumers have become more concerned about food safety and health. Therefore, the food regulators worldwide have shifted their focus from end product testing to monitoring throughout the chain of production. Application of Hazard Analysis and Critical Control Points (HACCP) at every level of food chain from the receipt of raw material, grading, transportation, distribution, handling at distribution centres, storage, processing, packing, to retail outlets till the product is finally consumed, provides assurance of safety of the food to the consumer.

There are several agencies engaged in the area of HACCP implementation and certification. The criteria, parameters and costs followed by these agencies while implementation, assessment and certification vary widely amongst them. APEDA has also been approached by manufacturers and exporters seeking recommendations on implementation and certification agencies for implementation and certification of HACCP in their units. In the absence of a procedure for recognition of such agencies, APEDA is unable to make any recommendations to this effect. Considering the emerging importance of application of HACCP in food processing, it is essential that minimum criteria and parameters for implementation and certification should be in place and that the costs are reasonable to the implementing units. therefore, lays down criteria and parameters for recognition of HACCP implementation agencies as well as HACCP certification agencies.

2.0 SCOPE

The scheme for recognition of HACCP implementation and certification agencies would cover implementation and certification extended to the exporters and processing units registered with APEDA and for export of products looked after by it.

3.0 DEFINITIONS

Appeal: Shall be the process by which a implementation and certification agency can request reconsideration of decision taken by APEDA.

Applicant: Shall be the implementation and certification agency that has applied for recognition by APEDA.

Audit: Shall include an independent assessment on-site to verify that the performance of an operation is in accordance with the procedure or processing standards.

Auditor: Shall be the person appointed by the APEDA recognised implementation and certifying agency to undertake the implementation and certification audit of an operator.

Certification: Shall be the procedure by which a written assurance is given by APEDA recognised certification agency that a clearly identified production or processing system has been methodically assessed and conforms to the specified requirements.

Code of Ethics: Shall mean requirements/principles to be followed by all HACCP auditors and lead auditors as well as implementation and certification agencies.

Committee: Shall mean panel constituted by APEDA for the purpose of evaluation and assessment of implementation and certification agencies.

Implementation: Shall mean the service extended by APEDA recognised implementation agency to the operators.

Evaluation: Shall be the process of systematic examination of the performance of the implementation and certification agency by APEDA to the extent it fulfills specific requirements of HACCP applications in all levels of food chain for exports.

Operator: Shall mean an individual or a business enterprise practicing food handling, food processing or allied activities.

Recognition: Recognition means approval, by APEDA through a recognition mechanism, to implementation and certification agencies for HACCP applications at all levels of the food chain for exports.

4.0 RECOGNITION CRITERIA FOR IMPLEMENTATION AND CERTIFICATION AGENCIES

4.1 Criteria for recognition of implementation agencies

Recognition of implementation agencies shall be governed by the following:

- Legal Status of the Agency and organization diagram
- Structure of the Agency
- Manpower strength of the Agency
- Strength of Food Sector Specialized Auditors and Lead Auditors
- Extent of updation of knowledge base of personnel of the Agency
- Area of Specialization of the Agency
- HACCP implementation credentials of the Agency
- Base of operating systems of the Agency for HACCP implementation
- Extent of ISO guide availability with the Agency
- Extent of FAO/WHO CAC guide availability with the Agency
- Status of Memorandum of Understanding with Certification Agencies in the area of HACCP, ISO, TQM, etc. worldwide
- Strength in training of the operator's personnel
- Fee charges of the Implementation Agency step-by-step from the stage of establishment of the HACCP team to recommendations for Certification in Indian Rupees.
- Details of training/updation of the implementation auditors, duration and name of the organizing institution.

4.2 Criteria for recognition of certification agencies

Recognition of certification agencies shall be governed by the following:

- Legal Status of the Agency and organization diagram
- Accreditation status of the Indian operation of the Agency specific to HACCP
- Structure of the Agency
- Specialized manpower strength of the Agency
- Strength in Food Sector Specialized Auditors and Lead Auditors
- Extent of updation of knowledge base of personnel of the Agency
- Area of Specialization of the Agency
- HACCP Certification credentials of the Agency

- Base of operating Systems of the Agency for HACCP Certification
- Extent of ISO guide availability with the Agency
- Extent of FAO/WHO & CAC guides availability with the Agency
- Status of Memorandum of Understanding with Implementation Agencies in the area of HACCP, ISO, TQM, etc. in India.
- Extent of refusal of Certification referred to the Agency
- Strength in imparting awareness to the personnel of implementation agencies and operators.
- Fee charges of the Certification Agency step-by-step from the stage of pre-certification audit to certification in Indian Rupees.
- Details of training/updation of the certification auditors, duration and name of the organizing institution.

4.3 Revision in recognition criteria

- **4.3.1** The recognition criteria may be revised by APEDA from time-to-time as may be considered necessary.
- **4.3.2** APEDA reserves the right to make changes in the recognition criteria for the development of the recognition program, international harmonization activities or other reasons as may be deemed necessary.
- **4.3.3** All applicants and recognised implementation and certification agencies will be informed of any changes in the criteria through a trade notice. The changes will also be placed on the APEDA website (**www.apeda.com**). The implementation of the revised criteria will come into force from the date of such notice.

5. 0 PROCEDURE FOR RECOGNITION

- The scheme for recognition of implementation and certification agencies is introduced on a voluntary basis.
- All applications shall be made in the **Form-I**, together with agency's tariff structure as per **Annexure-I** & **Annexure-II** to **Form-I**, along with the application fee, to APEDA, New Delhi or any of its Regional Offices, which shall forward these applications to the APEDA Head Quarters.
- All auditors, lead auditors and chief executive of the implementation or certification agency must sign and abide by the contents of the Code of Ethics and Personal Declaration (Annexure-III & Annexure-IV to Form-I).

- 5.4 The implementation/certification auditors those who are proposed by the applicant agency shall be on regular rolls of the agency for a minimum period of six months.
- 5.5 The implementation/certification auditors those who are proposed by the applicant agency shall not have multiple presences in other applicant's applications. In the event of such misrepresentations, the implementation/certifications auditors together with applicant agency will be summarily rejected by APEDA. Once rejected, such applicants will be allowed to submit fresh application to APEDA only after six months.
- APEDA will constitute a committee for the evaluation of implementation and certification agencies for HACCP application at all levels of the food chain meant for export purpose.
- 5.7 The committee shall inform the outcome of the evaluation and its recommendation to APEDA, which shall consider grant of Recognition Certification to the implementation or certification agency.
- Before recognition is issued to the implementation and certification agencies a Memorandum of Understanding (MoU) would need to be signed between APEDA and the implementation and certification agency, agreeing to the terms and conditions of the scheme and cost structure.
- **Form-II.** APEDA shall also publish the name of the recognised agency in its APEX Bulletin of APEDA and host this information on the APEDA website for a specified duration, with scope of recognition and date of expiry of the recognition certificate.

6.0 CONDITIONS OF RECOGNITION

6.1 Operational Requirements

Recognised implementation and certifying agencies shall operate based on the application of HACCP implementation and certification principles in addition to the following:

6.1.1 Competence

The implementation and certifying agencies shall have adequate resources, sound financial management and shall demonstrate professional competence based on adequate training and experience of its officers and personnel.

6.1.2 Independence

The implementation and certification agencies shall have structures and procedures to enable it to be free to operate without undue influence from vested interests or otherwise.

6.1.3 Accountability and responsibility

The officers and personnel of the implementation and certification agency shall be accountable by having clear lines of authority. The agency shall take full responsibility for all activities operated by its own officers and personnel and/or sub contracted within its system.

6.1.4 Objectivity

The implementation and certification agency shall be impartial. Implementation and certification shall be based on an objective assessment of relevant factors. These factors shall be in conformity to objectives of assurance of the safety of food and food materials by food business operators based on the principles that are applied in the development of the HACCP system as referred to in the Codex Alimentarius FAO/WHO (CCFH).

6.1.5 Credibility

The implementation and certification agency shall take all adequate measures to ensure that there is no misuse of its licenses, certificates and marks of conformity.

6.1.5.1 Access to Information

Production standards, organizational structures, financial sources, rules and procedures for granting of certification, training arrangements for personnel, procedural records, and similar information shall be published or made available, as deemed appropriate. A list of certified units shall also be published. In case of certification audits, the deficiencies highlighted in the first visit should be submitted to APEDA by the certification agencies.

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6.1.5.2 Confidentiality

The implementation and certification agency shall have adequate arrangements to ensure confidentiality of information regarding specific operators, (certified in the course of its certification activities) at all organisation levels, including committees and contracted agencies.

6.1.5.3 Participation

The implementation and certification agency shall provide adequate procedures for enabling input from affected parties, in addition to participating in HACCP updating forums.

6.1.5.4 Non-discrimination

The policies and procedures under which the implementation and certification agencies operate and their administration shall be non-discriminatory and shall be administered without reference to race, national background, religious affiliation, gender, age or marital status.

6.2 Procedural Requirements

- **6.2.1** Based on HACCP principles, the procedures to be followed by the recognised agencies for implementation and certification for HACCP implementation or certification or both, will cover:
- **6.2.1.1** Responsibility of Management in relation to product safety
 - Policy of the Company
 - Scope of the HACCP system to be assessed
 - Tasks responsibilities & authorities
 - HACCP team composition

6.2.1.2 Product information

- Product characteristics
- Details of intended use of the end product

6.2.1.3 Process Information

- Flow diagram
- Layout
- Control & verification process information

- **6.2.1.4** Hazards and control measures
 - Hazard identification
 - Risk analysis
 - Control measures
- **6.2.1.5** Determination of CCPs and its scientific evaluation
- **6.2.1.6** Establishment of Critical Limits
- **6.2.1.7** Monitoring of CCPs
- **6.2.1.8** Corrective actions
- **6.2.1.9** Validation
- **6.2.1.10** Verification, Compliance and Corrective actions
- **6.2.1.11** Review procedures
- **6.2.1.12** Documentation, document data control and records
- **6.2.1.13** Training
- **6.2.1.14** Certification
- **6.2.1.15** Surveillance
- 6.2.2 The implementation and certification agencies shall have policies and procedures for dealing with complaints against its operation and against certified operators.
- **6.2.2.1** Complaints shall be dealt with by the agency in a speedy and efficient manner as per the Quality Policy, Client Audit Record System and Discipline & Client Grievance Redressal System in the organization.
- When a complaint is resolved, a documented resolution shall be made and forwarded to the complainant and the party concerned. The implementation and certifying agencies shall keep a record of all complaints and remedial actions relating to implementation and certification.

7.0 VALIDITY

7.1 The recognition certificate would be valid for the period specified in the recognition certificate.

7.2 Renewal of Recognition

- **7.2.1** The implementation and certification agencies may apply for renewal of their recognition at least two months before the expiry of the validity of recognition.
- **7.2.2** The procedure for renewal of the recognition will be as for the initial recognition.
- **7.2.3** Renewal is also required for all auditors, lead auditors.

8.0 QUALIFICATIONS OF THE IMPLEMENTATION AND CERTIFICATION AUDITORS

- **8.1** The implementation and certification auditors of the implementation and certification agencies shall be from the following basic disciplines:
 - a) Food microbiology
 - b) Dairy technology (dairy microbiology/dairy chemistry)
 - c) Food technology
 - d) Food chemistry
 - e) Food and nutrition
- While submitting the fresh and renewal application, the implementation and certification agencies shall submit CVs, certified copies of testimonials, etc. of the implementation and certification auditors, who have signed code of ethics together with personal declaration belonging to the above specialization categories only:
- While extending provisional recognition to the agencies by APEDA, they will be clearly informed that the auditors from the above disciplines (by name) will only be authorized to provide their services to the industry for implementation and certification of HACCP. APEDA reserves the right to check from the exporters to verify the auditor's performance.

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The implementation and certification bodies shall submit HACCP implementation and certification audit log as per **Annexure-IV to Form-I**, showing the following auditing experience of the implementation and certification auditors:

Auditor	Minimum of 5 complete audits totaling at least 20 days duration.
Lead auditor	Minimum of 10 complete audits totaling at least 40 days duration, with at least 5 of these audits as leader of an audit team.

9.0 FEE

- 9.1 A fee of Rs. 10,000/- (non-refundable) in the form of demand draft drawn in favour of APEDA, New Delhi may be sent along with application for recognition. The renewal fee will be Rs. 5,000/-.
- **9.2** Any revision in the fee structure will be communicated.

10.0 TERMINATION OF RECOGNITION

- APEDA may terminate the recognition status of a implementation or certification agency, if performance and conduct of the agency is not in accordance with the conditions of recognition laid down under para 6.0 of this scheme.
- 10.2 The recognition status of the implementation or certification organisation as well as those of the auditors etc. may be terminated in case of violation of any of the conditions of any declaration, undertaking, verification or MoU signed for the purposes of issue of the Recognition Certificate.
- 10.3 In the event of de-recognition, the implementation or certification Recognition Certificate in original to APEDA within ten days of the receipt of communication to that effect.
- Information about de-recognition will be published in the APEX Bulletin and also hosted on the APEDA website.

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11.0 APPEALS

- Applicant or recognised implementation or certification agency may appeal against recognition decisions.
- Appeals may be addressed to Chairman, APEDA and should reach within 15 days from the receipt of recognition decisions against which the appeal is made.
- 11.3 Chairman, APEDA will take a decision in respect of the appeal within 60 days.
- In case of cancellation of recognition, the appeal shall be accompanied by the original Recognition Certificate.
- APEDA will consider the application on merit and, in case, found necessary, order re-evaluation of the agency during which time the anomalies pointed out by the evaluation committee should be rectified.
- 11.6 If approved, a fresh Recognition Certificate shall be issued on payment of a fee of Rs.10,000/-. The intervening period between the cancellation of the Recognition Certificate and issue of fresh Recognition Certificate shall be taken to imply that the agency is not recognised during this period.

12.0 ISSUE OF DUPLICATE RECOGNITION CERTIFICATE IN CASE OF LOSS OR MUTILATION

In case of loss or mutilation of any Recognition Certificate, a duplicate Recognition Certificate may be issued on payment of Rs.5,000/-. The validity of the duplicate Recognition Certificate shall be the same as that of the original.

PLACE: NEW DELHI
DATE: 24th September 2004

(K S MONEY)
CHAIRMAN

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APPLICATION FOR GRANT/RENEWAL OF RECOGNITION OF IMPLEMENTATION AND CERTIFICATION AGENCIES

(When filling this application, please ensure that all sections are completed in all respects and that all requested information is correctly and honestly provided. The applicant must sign each page of the application form. Incomplete applications, hand written applications will be summarily rejected).

- Name and address of the applicant
 Telephone No
 Fax No
 E-mail address
 Name of Chief Executive
- 2. Year of foundation :
- 3. Legal status of the agency :
- 4. Recognition applied for
 - a) Implementation agency :
 - b) Certification agency
 (Please enclose copy of
 accreditation certificates
 specific to HACCP in
 India operations)
- 5. List of rejections/suspension (rate of rejections of certifications)
- 6. List of implementation/certification Auditors
- 7. Scope of implementation/certification requested (specify HS Code upto 4 digits)
- 8. Recognition and reciprocity (Is the applicant already recognised by any other recognition program? Do you hold any reciprocal agreements with other certifiers. If yes, please give details (attach a separate page) & provide copy of the letter & certificate as proof

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- 9. Organization's Human Resources
 - a) Please provide the organizational structure (number of auditors and technical personnel, their qualification, areas of experience etc. specific to HACCP only alongwith latest CVs duly signed by the implementation/certification auditors).
 - b) Please provide information regarding the qualification, credentials and experience of the key individuals responsible for the development and management of the HACCP implementation or certification programmes.
 - c) Identify (by name) whether these key individuals are employees of your organization or whether they are free lancers.
 - d) Please provide copies of professional membership of your agency and/or auditors.
 - e) Do you have the ISO guide, FAO-WHO Codex Alimentarius Commission reference guides/manuals/ operating standards? Please indicate the year of publication?
 - f) Please submit a complete set of training material for the products covered by your application (please refer Sl. No. 7 above).
 - g) Do you have any Quality Policy, Client Audit Record System and Discipline & Client Grievance Redressal System in your organisation? Please elaborate.
 - h) Provide details of export rejections of your clients in last two years
- 10. Performance/turnover during the last three years
- 11. Description of record system

:

12.	Please indicate your tariff structures (Annexes I & II to For	: · m-I)
13.	List of Annexures	:
14.	Details of the Bank draft	:
	DEC	LARATION
unde	I/we,erstood the implementation and cer the same in respect of my/our ager	declare that I/we have read and tification procedures and have complied ncy.
unde	erstood application of HACCP Impl	eclare that I/we have read and ementation and certification for expor- respect of my/our agency located at
(c)	I/we, confirm that I/we will obser	ve the APEDA Code of Ethics.
	I/we, agree to the publication of t DA recognized HACCP implementati	he name of my/our agency in the list of on and certification agencies.
	UNDER	TAKING
that abov unde	gnition stated in the scheme and a may be issued by APEDA in this e agency inspected whenever calle	so agree to follow the conditions of also agree to abide by any instructions respect from time to time and get my d on to do so by the Authority. I also ll entail cancellation of Recognition
	VERIFIC	CATION
	I,do vledge and belief, the above informate to abide by the conditions laid down	hereby declare that to the best of my ation is complete and correct and that i vn in this behalf.
DATI PLAC		AUTHORISED SIGNATORY NAME & DESIGNATION

ANNEXURE-I TO FORM-I

Areas to be covered for the purpose of implementation by HACCP implementation agencies (please elaborate how you propose to achieve alongwith time-schedule)

Cost in Rs.

Implementation and training

(P	ł)
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Establishing and assembling in-house HACCP team

Describing product

Identifying intended uses

Establishing flow diagram

Confirming flow diagram on-site

Establishing GMPs, GHPs, and sanitations, on site

Listing all potential hazards, conducting a hazard analysis and

considering any measures to control identified hazards.

Determining Critical Control Points CCPs

Establishing critical limits for each CCP

Establishing monitoring system for CCPs

Establishing corrective actions

Establishing verification procedures

Establishing documentation and record keeping

Preparation of SOPs

(B) Travel & hospitality (tentative)		
	TOTAL:	

DATE: AUTHORISED SIGNATORY PLACE: NAME & DESIGNATION

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ANNEXURE-II TO FORM- I

(Fee structure to be followed by Certification Agencies)

Cost in Rs.

1. 2. 3. 4.	Certification audit Certification Surveillance Travel and hospitality (tentative)	
	TOTAL	
DATE PLAC		AUTHORISED SIGNATORY NAME & DESIGNATION

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ANNEXURE-III TO FORM-I

CODE OF ETHICS TO BE FOLLOWED & SIGNED BY THE HACCP AUDITORS/LEAD AUDITORS OF THE IMPLEMENTATION/CERTIFICATION AGENCY

All personnel of the HACCP implementation or certification agencies recognized by APEDA have an obligation to improve the standing of their profession by observing the APEDA Code of Ethics in this regard. Compliance with the code is a condition of grant/renewal of the Recognition Certificate. The format of the declaration given below specifies the contents of the Code and is required to be signed by each auditor & lead auditor and verified by the chief executive of the applicant agency.

DECLARATION

I/we, confirm that I/we have complied with the APEDA Code of Ethics as outlined below and that any complaint regarding my/our performance has been formally dealt with in the organisation in a manner so as to prevent recurrence. I/we further undertake to abide by these requirements:

- 1. To act professionally, accurately and in an unbiased manner.
- 2. To strive to increase the competence and prestige of the profession.
- 3. To undertake only those audits that I/we am/are competent to perform.
- 4. To assist those in my/our employ or under my/our supervision in developing their management, professional or auditing skills.
- 5. To discuss with any client or employer any relationships that may be seen as a conflict of interest and that may influence my/our judgment.
- 6. Not to discuss or disclose any information relating to an audit unless required by law or authorized in writing by the auditee and the auditing organization.
- 7. Not to accept any inducement, commission, gift or any other benefit (apart from fair payment) from auditee organizations, their employees or any interested party or knowingly allow colleagues to do so.
- 8. Not to intentionally communicate false or misleading information that may compromise the integrity of any audit.

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9.	Not to act in any way that would prejudice the reputation of APEDA or
	their recognition process and to co-operate fully with an enquiry in the
	event of any alleged breach of this Code.

10. I/we (in case of implementation assignments) shall not undertake HACCP certification programme of the operators. Similarly, I/we (in case of certification assignments) shall not undertake HACCP implementation or training of the operators.

Date: Place:	Signature of the auditor/ Lead Auditor			
	NAME	:		
	Address	:		
	E-mail address Mobile No.	: :		
	Verified by the Chief Ex	ecutive of the agency		
	Signature :			
	Names :			
	Designation:			
Date:				

ANNEXURE-IV TO FORM-I

PERSONAL DECLARATION PROFORMA TO BE GIVEN BY THE HACCP IMPLEMENTATION AND CERTIFICATION AUDITORS

1.		I,, submit the following information for							
_		consideration of APEDA for HACCP implementation/certification auditor:							
2.		I am working with M/s (name of the implementation/certification agency) since							
2		the implementation/certification agency) since On behalf of M/s (name of the							
3.		On benair of M	1/S	\ T 1_	(name of the				
			/certification agend /certification audits/		ave conducted following				
		implementation	/ cer uncauon audits/	mspection	118.				
Ī	Sr.	Name of the	Type of audit	Date(s)	Status of				
	No	unit(s)	(implementation/	of	implementation/				
			certification)	audits	certification of the unit				
			,						
1		IC I:11 -1	41	N/T /	(12.22.2.2.5.41.2				
4.		II, I WIII CHA	inge the agency	VI / S	(name of the				
					inform the same to APEDA				
			/certification within		ich I am authorised for				
		implementation	/ cer uncauon within a	a week.					
			CERTIFIC	ATE					
					fy that to the best of my				
		_		_	plete and correct and that				
ag	gree	to abide by the o	conditions laid down	in this be	half.				
\Box	ate		Signature of	the oudi	tor/				
	ace		Lead Audito		itor /				
1 1	acc	•	Name	•					
			Address	•					
			Telephone N						
			relephone iv	0.					
			Verified by t	he chief e	xecutive of the agency				
			Signature	•					
			Names	•					
			Designation						
			S						
	ate:								
P1	ace:								

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ANNEXURE-IV TO FORM-I

CERTIFICATION AUDIT LOG SHEET FOR CERTIFICATION AGENCIES

gency:
gency

Name of the Certification Auditor:

Dates of Audit	Duration in days	Name & address of the unit audited Contact person, phone fax, email	Your role Team member or auditor Team Leader Auditor/Team Leader	Name of the Audit Team Leader Contact phone, fax, email and auditor ID	Total members in audit team	certification	Agency requesting audit, if applicable Contact person, phone, fax, email	Verification of audit by the agency and accreditation body. Signature and name (include phone, fax, email and state relationship to
				number				and state relationship to auditor)

Please Note: Each audit on this Audit Log sheet should only be verified where the performance of the auditor is deemed to be satisfactory.

DATE: AUTHORISED SIGNATORY PLACE: NAME & DESIGNATION

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ANNEXURE-IV TO FORM-I (contd.)

IMPLEMENTATION LOG SHEET FOR IMPLEMENTATION AGENCIES

Name of the Implementation Agency:

Dates of Duration in days implementation	Organization where system implemented Contact person, phone, fax, email)	or	System implemented by (Name of the team leader Contact phone, fax, email and ID number	in the team	Scope of implementatio n category and standard used	of system

Please Note: Each implementation on this log should only be verified where the performance of the implementation auditor is deemed to be satisfactory.

DATE:

AUTHORISED SIGNATORY
PLACE:

NAME & DESIGNATION

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FORM - II

AGRICULTURAL AND PROCESSED FOOD PRODUCTS EXPORT DEVELOPMENT AUTHORITY (DEPARTMENT OF COMMERCE, GOVT. OF INDIA)

RECOGNITION OF HACCP IMPLEMENTATION & CERTIFICATION AGENCY

This is to certify that the HACCP implementation/certification agency described below has been recognised by APEDA and considered to be competent to meet the required levels.

1.	Name of agency	:
2.	Recognition No.	:
3.	Recognition validity upto	:
3.	Recognition Status	
	a) Implementation	:
	b) Certification	:
Place: Date:	New Delhi	For and on behalf of APEDA

3rd FLOOR, NCUI BUILDING, 3 SIRI INSTITUTIONAL AREA, AUGUST KRANTI MARG (OPP. ASIAD VILLAGE), NEW DELHI – 110016

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DIRECTOR