SV BOTANICA · PREMIUM NATURAL INGREDIENTS · EST. INDIA

# The Extract Brief

*A monthly briefing on the trade in botanical extracts — regulation, quality, supply & freight — compiled for the professional buyer.*

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PLATE I — *Silybum marianum* L., THE MILK THISTLE · A. ACHENE · B. FLORET

THE SPECIMEN OF THIS NUMBER — SEE P. 4

## IN THIS NUMBER



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I. Europe moved a step closer to a formal safety review of **ashwagandha** — the largest Indian botanical export line.

II. A new EU pesticide regulation names **concentrates and extracts** explicitly; compliance falls due 29 January 2027.

III. US tariffs on Indian goods settled at **18 per cent**, down from a peak of 50 — and ocean freight kept softening.

## § 1 Regulatory Watch

BRUSSELS · CANBERRA · THE BORDER

### 1.1 Ashwagandha edges toward an EU Article 8 review

On the fourteenth of July, a meeting at the European Parliament — hosted by MEP Sean Kelly and organised by Kerry Group — launched *Safeguard Ashwagandha*, an industry initiative to put the botanical's peer-reviewed safety record in front of regulators before any formal assessment begins. At stake is an **Article 8 review** under Regulation (EC) 1925/2006: the process that can end in restrictions, mandatory label warnings, or a ban. No EFSA assessment is open yet; the initiative exists precisely because the sector expects one. Australia's TGA, meanwhile, issued its own ashwagandha safety update on 20 July.

☞ **To do now:** *if ashwagandha sits in a 2027 pipeline, ask the supplier for species and plant-part authentication (root versus leaf), the withanolide assay method behind the label claim, and batch documentation fit for a safety dossier. The suppliers who can produce that file quickly are the ones whose material keeps moving.*

### 1.2 The MRL rule that names extracts

Regulation (EU) 2026/1546, adopted **9 July** and applicable **29 January 2027**, revises residue limits for benomyl, carbendazim and thiophanate-methyl across herbs and spices — and, explicitly, *botanicals, concentrates and extracts*. The recital concedes what exporters have long argued: concentration during drying or extraction increases the commercial significance of residues. A raw herb passing at 0.05 mg/kg can yield a 10:1 extract reading several times higher; both certificates are honest, and only one clears the border. Extract-level testing is now the only defensible position.

### 1.3 Novel Food: two sides of the line

**Gotu kola**, southern ginseng, wild oregano and white sage are deemed novel in EU food supplements — unauthorised without a Novel Food authorisation — while **pomegranate extract** was confirmed non-novel and stays freely marketable. The Union's year to date: fifteen authorisations against twenty-one rejections.

### 1.4 Also on the radar

**MOAH/MOSH** — maximum limits adopted 11 June; relevant to oleoresins and lipid-based extracts.

**Berberine** — EFSA's public consultation on regulatory status remains open.

**Monacolin K** — a proposed ban decision is expected before the year closes.

**PFAS** — banned in EU food-contact packaging from 12 August 2026; check drum-liner specifications.

**Border controls** — Reg (EU) 2026/194 delisted Indian vanilla and cloves on sustained compliance and set *Piper*, *Capsicum* and *Pimenta* at 20 per cent checks; a June amendment (2026/1206) revised the annexes again. Verify the current listing for each commodity before shipment planning.

29 · I · 2027 — THE DAY EXTRACT-LEVEL TESTING BECOMES LAW

## § 2 Quality Desk

THE MORINGA OUTBREAK, READ PROPERLY

On 17 July the CDC and FDA closed their investigation into a multistate outbreak of extensively drug-resistant *Salmonella* traced to moringa leaf-powder capsules: thirty-four illnesses, eleven hospitalisations, and recalls spanning product distributed from December 2025 through July 2026.

The lesson is not *avoid moringa*. It is that powder and extract are different microbiological propositions. A leaf powder is dried plant material — often sun- or air-dried at origin — carrying whatever bioburden the field and the drying yard left on it. A solvent-extracted, spray-dried extract has passed through steps hostile to vegetative pathogens. The buyer's protection is specification: total plate count, yeast and mould, pathogen absence per 10 g — and the question of *how* the material was treated, since steam sterilisation and ethylene-oxide treatment carry opposite consequences for an EU-bound shipment.

> *"Leaf powder and leaf extract are different microbiological propositions."*
>
> QUALITY DESK · № 1

Thirty-four case files, eleven hospital admissions and one drug-resistance profile make the argument better than any sales letter: microbiology belongs on the specification, not in the assumptions.

## § 3 Supply & Price Direction

FROM THE MANDIS

**Turmeric is firming.** Mandi prices moved from roughly ₹13,900 per quintal in early July to an August average near ₹14,900 — some six per cent inside a month, with Telangana and Andhra Pradesh holding half the planted area. Extract buyers should expect the move to reach curcumin 95% contract pricing on the customary one-quarter lag: fourth-quarter quotations will carry it. The prudent response is neither panic nor pre-buying, but asking the supplier which crop the quote is written against.

## § 4 Knowledge Series

№ 1 — WHY TWO HONEST COAS CAN DISAGREE

Each number of this Brief takes one recurring buyer's question and treats it properly. First: the assay-method problem, the most common source of specification disputes we see. Ultraviolet spectrophotometry measures everything in a sample that absorbs at the target wavelength — the whole actives complex, and anything else absorbing beside it. High-performance liquid chromatography separates the individual compounds and counts only those it names.

Neither method is wrong; they answer different questions. But *forty per cent by UV* and *ten per cent by HPLC* can describe the same powder, and a purchase order that states a number without its method is an invitation to a rejected shipment. The rule that prevents the dispute costs one line: **write the method beside the number.**

Further reading in our library at *svbotanica.com/insights*: *How to Read a CoA · Silymarin: UV v. HPLC · Withanolides: Gravimetric v. HPLC · Bacosides: HPLC v. UV.*

FROM THE DESK OF SV BOTANICA

MUMBAI · AUGUST 2026

*Every quarter a buyer sends us a raw-material pesticide report and asks why the extract needs testing of its own. It is always asked in good faith — the herb passed; surely the extract passes too. But extraction is concentration, and residues concentrate along with the actives. We have spent years making that argument specification by specification; this month, Regulation 2026/1546 made it for us, in a legal text with a compliance date attached. If an incoming-QC protocol still tests the herb and not the extract, January 2027 is the deadline for changing it — and the supplier should be volunteering the extract-level data before being asked.*

*— The desk*

## § 5 The Specimen: Milk Thistle

SILYBUM MARIANUM L. · ASTERACEAE

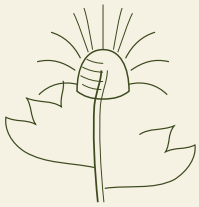

PLATE I (DETAIL) — FLOWERING HEAD

| | |
|---|---|
| BOTANICAL | *Silybum marianum* L., seed (fruit) |
| ACTIVES | Silymarin — flavonolignan complex: silybin A&B, isosilybin A&B, silychristin, silydianin |
| TRADE GRADE | 80% silymarin by UV *(≈ 30% silibinin by HPLC)* |
| MONOGRAPHS | Ph. Eur. & USP — both quantify on the HPLC / silibinin basis |
| WATCH FOR | Cutting with cheaper *Carduus* thistle seed; UV-only specifications |

Milk thistle is one of the world's highest-volume liver-support ingredients, and the perfect illustration of this number's Knowledge Series. Silymarin is not one molecule but a complex of six flavonolignans, and the market's workhorse grade — **eighty per cent by UV** — describes the same powder that reads near thirty per cent when assayed by HPLC as silibinin. Two honest numbers; one material; endless disputes between buyers who compare one supplier's UV figure against another's HPLC figure.

Three things belong on every milk thistle specification. The **method beside the number**, first and always. An **HPLC identity fingerprint** second: silymarin content drives price, which makes the seed a known target for economically motivated cutting with cheaper thistles, and a UV-only specification is the easiest to fool. Third, the **EU-entry trio** — heavy metals by ICP-MS, residual solvents, and ethylene-oxide status — which decides whether the shipment clears customs at all.

Demand context: the liver-health category continues to grow on alcohol-alternative and metabolic-wellness positioning, and silymarin remains its anchor active. The full dossier — buyer's guide, regulatory notes, sourcing, adulteration — stands in our library at *svbotanica.com/insights*.

## § 6 Logistics & Trade

TARIFF · FREIGHT · CARBON

**Tariff.** United States duties on Indian goods now stand at 18 per cent, down from a peak of fifty, the February interim agreement having rescinded the punitive tranche. India's AYUSH and herbal exports to the American market ran to some $689 million in FY 2024–25, led by ashwagandha and turmeric. **Freight.** The Drewry index fell four per cent to $4,374 per forty-foot box in the week ending 23 July; India–Europe spot sits at $3,500–4,500 with Cape routing adding ten to fourteen days.

**Carbon.** The EU's emissions-trading scheme reached full cost recovery this year, adding an estimated $150–400 per container on Asia–Europe lanes. The charge is structural, not cyclical; it belongs in every landed-cost model from here on.

## § 7 Dates for the Diary

| DATE | WHAT HAPPENS |
|---|---|
| 12 · VIII · 2026 | PFAS ban in EU food-contact packaging applies |
| Q3 · 2026 | EU consultation opens on harmonised vitamin & mineral maximum levels |
| Late 2026 | Monacolin K ban decision expected |
| 29 · I · 2027 | Regulation (EU) 2026/1546 pesticide MRLs apply — extracts in scope |

# SV Botanica

PREMIUM NATURAL INGREDIENTS

SV Botanica is an India-based **B2B supplier and exporter** of standardised botanical ingredients for supplement, food and cosmetic manufacturers worldwide. Every material ships export-ready with full documentation — batch Certificate of Analysis, HPLC assay, specification sheet — and is tested against the standards our buyers' markets actually enforce: EU pesticide MRLs, heavy metals and ethylene oxide, with third-party laboratory verification.

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№ 2 — AUGUST 2026

*The regulatory month, the Knowledge Series continued, and a new specimen. Every number at svbotanica.com/insights.*