

Brief Introduction to Requirements for Organic Imports into the European Union (EU), European Economic Area (EEA), Switzerland (CH) or Northern Ireland (NI)

according to the European Regulation (EU) 2018/848

Import of organic food:

- ❖ Must assure traceability and transparency
- ❖ Requires a good documentation system

1. Who needs to be certified as organic importer:


Customs agents who do not become owners of the product	No
Traders or importers who buy and sell the product, without repacking or relabelling it (possibly without being in contact with the product)	Yes
Handlers who repack or label the product	Yes

2. The regulatory situation in the EU:

When we speak about "import", we always refer to import from third countries (non-members of the EU, EEA, CH or NI). Trade between member countries is free and not considered as "import". **Regulation (EU) 2018/848** establishes the rules for organic imports. Imported products are generally considered as "compliant" (Article 46), with the exception of products that are accepted as "equivalent" under a trade agreement between the EU and a specific third country (Article 47).

3. Steps to the import of organic products to the EU from countries outside the EU:

- a. First, you must be **certified** as an **organic importer** and registered as such by your national authorities; please contact an authorised certifier in your country.
- b. Second, you must make sure that your **supplier** holds a **valid certificate** for organic products complying with Reg. (EU) 2018/848 – meaning that the certifier who issues the document must be listed in Annex II of Regulation (EU) 2021/2325 for the respective country or, where the product comes from a third country whose national organic standard has been recognized as equivalent under a trade agreement, must be recognized as certifier of the equivalent national standard of the respective country. Additionally, you must be sure that the certifier is approved for the respective category (A: unprocessed crops, B: unprocessed products of animal origin; C: aquaculture; D: processed food; E: feed; F: seeds and propagation material).
- c. For each shipment (consignment), a **Certificate of Inspection (COI)** (sometimes called TC or transaction certificate) must be issued before the goods leave the country of export (= country where the last operation for the purpose of preparation is carried out); this COI must be issued by the control body (or control authority) of the operator carrying out the last operation for the purpose of preparation (e.g. last step of packaging or labelling). The respective commercial documents must be submitted (invoice, transport documents, etc.), but also documents showing the organic origin of the respective lot.
- d. The COI is issued through an online system called **"TRACES"**. For further details, refer to Brief Info 3.2.8.1.
A product imported without a valid COI endorsed by the competent authority in the EU is considered conventional!
- e. The importer has the obligation to **verify that the information in the different documents and the labels coincides and is correct**. Among others, he must verify that products, invoices, and transport documents carry the **correct code** of the certifier of the last entity that has handled the product. In the case of CERES, the code is XY-BIO-140 in the countries for

 CERES	3-2-8-4_EN Inf	Brief Introduction to Import of Organic Products Reg (EU) 2018/848	v 17.09.2021	2/2
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which CERES is approved (XY to be replaced by the official code of the country of export, for example, PY for Paraguay, or DO for the Dominican Republic. In those cases where the product is imported as equivalent under a trade agreement, the code is different, e.g. CL-BIO-005 for goods imported from Chile as equivalent under the trade agreement.)

- f. The importer also has the obligation to **analyse the possible risks** that the product might not comply with the standard, and take the respective measures - for example, analysis of pesticide residues, or visits to producers and exporters in the country of origin.
- g. Once inside the EU, the organic product can be marketed freely.

Please be aware that this is only a selection of essential requirements of the organic standards, meant as an introduction. The operator, of course, has to learn about and meet all requirements of the respective standard.