



Imports of products from Ex-Soviet States

The European Commission have placed additional controls on the import of certain organic goods from the countries detailed below; this is following concerns over the organic integrity of products.

Ukraine
Kazakhstan
Russian Federation

These controls apply to organic food and feed with the following CN codes (see <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=URISERV:l11003>)

Chapter 10 – Cereals

Chapter 11 – Products of the milling industry; malt; starches; inulin; wheat gluten

Chapter 12 – Oil seeds and oleaginous fruits; miscellaneous grains, seeds and fruit; industrial or medicinal plants; straw and fodder (including 12.06 - Sunflower seeds)

Chapter 23 – Residues and waste from the food industries, prepared animal fodder (including 23.06 -Oilcake and other solid residues, whether or not ground or in the form of pellets, resulting from the extraction of vegetable fats or oils, other than those of heading 2304 or 2305)

This also applies if the product is imported via another country before entry into the EU. For example, product originating in Ukraine but imported via Turkey then into the UK, will still require the same controls as product imported direct from Ukraine to the UK.

What do these controls mean for you?

If you import, or intend to imports any products affected by this you need to take the following action:

Point of entry

- The importer of affected organic goods, together with the Port Health Authority, need to ensure there is complete documentation for consignments at the point of entry:
- Certificate of inspection, boxes 1 to 15 completed (box 4 is no longer required)
- Documents of custom declaration
- Transport documents
- Product traceability: the verification of names, addresses and valid certification of all operators in the trade flow

Sampling & analysis

- Sampling of consignments must be undertaken by the importer into the EU as soon as it is practically possible, but this **must** be before sale and/or use as organic.
- At least 1 representative sample shall be taken of each consignment.
- Sampling for feed shall be done by using the methods described in Commission Regulation (EU) No 691/2013 on the sampling methods to be used for official control of feed. Sampling for food products must be done in accordance with CODEX CAGC/GL 50-2004
- The importer has responsibility for collecting and sending the samples for analysis.
- Samples must be clearly and individually labelled including the lot/batch number and number of the Certificate of Inspection.

As a minimum, the following traceability information must be recorded for the samples taken:

- Batch/lot number
- number of the certificate of registration
- details of the container e.g. sealed or open
- details of the supplier (name and contact details i.e. address, telephone number and e-mail address)

- copies of the delivery documents and goods in log (i.e. the documents accompanying the product when it was delivered to the operator)
- the date that the product was delivered to the operator
- details of where the sample is taken from, e.g. from container
- the size of the consignment from which the sample was taken
- the date that the sample was taken
- the name of the person taking the sample

Testing

- Analysis must be carried out by a laboratory accredited to EN ISO/ IEC 17025 and EN ISO/ IEC 17011. In the UK laboratories must be accredited by the United Kingdom Accreditation Service (UKAS).
- As well as the labs individual tests must be accredited and identify a broad range of pesticides certifying that there has been no contamination of the consignment by substances not authorised for EU organic production.
- If no accredited test exists for a substance found to be present in the screening test, contact us for guidance.
- The sampling report of each sample must contain the identification of the consignment: i.e. lot number and number of the Certificate of Inspection (box 3 on the COI).

Outcome of Test Results

- Before releasing the consignment for sale as organic you must submit the test results to Soil Association Certification (sacl.notifications@soilassociation.org), together with a copy of the Certification of Inspection, endorsed n box 17 by the Port Health Authority, for the consignment the sample was taken from.
- On provision of a negative test result we will provide confirmation of approval to release the consignment for sale as organic.
- If the test results show any non-permitted pesticides, the consignment must not be marketed or sold as organic until there has been an investigation carried out by us with a satisfactory conclusion.

If you have any queries please contact us on proc.cert@soilassociation.org, or on 0117 914 2411