



Exporting Organic Products into the EU, EEA, or Northern Ireland

Before you arrange to export organic products into the EU, EEA, or Northern Ireland you must ensure as the exporter you hold organic certification, even if you don't handle the goods yourself. To certify with Soil Association Certification, you will need a UK registered address. You can find details of how to apply [here](#)

This document provides a summary of the export requirements for products covered by the EU-UK Trade Cooperative Agreement (TCA).

1. Scope of the UK-EU Trade Cooperative Agreement (TAC).

The TCA covers products which are grown/produced or processed in the UK or imported into GB and then processed. Please see the scope detailed below:

Products eligible for export to the EU, EEA, or NI under the TCA

Products	Comments
Unprocessed plant products	Produced/grown in GB
Live animals or unprocessed animal products (including honey)	Produced/grown in GB
Aquaculture products and seaweeds	Live or unprocessed produced/grown in GB
Processed agricultural products for use as food	Only if processed in GB
Processed agricultural products for use as feed	Only if processed in GB
Seeds and propagating material	Produced/grown in GB

Products imported into GB and not further [processed](#), or imported and simply packed and/or labelled, are not covered by the TCA. For example, finished retail packed product; fresh produce, herbs & spices imported and re-packed or re-labelled; unaltered raw material would not be covered.

If you wish to export products to the EU which are not covered by the scope of the TCA please visit our webpage [here](#).

Products eligible for export to GB from the EU under the TCA

The same restrictions apply as detailed above

Products	Comments
Unprocessed plant products	Produced/grown in EU
Live animals or unprocessed animal products (including honey)	Produced/grown in EU
Aquaculture products and seaweeds	Produced/grown in EU
Processed agricultural products for use as food	Only if processed in EU
Processed agricultural products for use as feed	Only if processed in EU
Seeds and propagating material	Produced/grown in EU

Products imported into the EU and not further [processed](#), or imported and simply packed and/or labelled, are not covered by the TCA. For example, finished retail packed product; fresh produce, herbs & spices imported and re-packed or re-labelled; unaltered raw material would not be covered.

All categories of products can be exported freely from NI to GB.

2. Definition of Processed Products

Organic regulation 889/2008 defines 'processing' as meaning: 'any action referred to in point (m) of Article 2(1) of Regulation (EC) No 852/2004, including the use of substances referred to in Article 19(2)(b) of Regulation (EC) No 834/2007. Packaging or labelling operations shall not be considered as processing.'

Article 2(1) of 852/2004: Article 2(m): "processing" means any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes.

Unprocessed products are referred to in Article 2(n) of 852/2004: "unprocessed products" means foodstuffs that have not undergone processing, and includes products that have been divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen or thawed.

Defra have issued guidance to UK CBs with their interpretation, which is that:

- there must be a **substantial alteration** to the ingredient/s for the product to be considered as processed.
- even when the substances listed in Article 19(2)(b) of Regulation (EC) No 834/2007 are used, the product must also be substantially altered if it is to count as processed. In some cases, the addition of the substance may be enough to alter the initial product substantially.
- it is not possible to provide an exhaustive list of processing actions that are deemed acceptable as the effect on the ingredient/s may be different in each case, so products should be assessed on a case by case basis to determine if the action taken substantially alters the ingredient/s. For example, simply heating an ingredient slightly might not be enough to substantially alter it, but if the heating makes a substantial alteration – such as pasteurisation – this would count as processing
- this advice is based on Defra's interpretation of the regulations and is not an authoritative statement of the law. The regulation may be interpreted differently by the EU Commission, and/or the courts.

We have provided a list below, but this is not exhaustive for the reasons as detailed above..

Examples of activities that would be classed as unprocessed:

- Product imported as already finished retail packed product
- Simply packing or labelling, e.g. fresh produce, herbs & spices, nuts, dried goods, packing of oils or liquids
- Product that is just washed, trimmed or frozen

Examples of activities that could be classed as processed:

- Deodorising oil
- Product dried, cooked, roasted or smoked Heating where this substantially alters the ingredient, (decided on a case by case basis). Would include heating honey where it is changed from crystallised form to liquid.

- Tea into teabags
- Curing
- Maturing
- Marinating
- Encapsulating
- Extraction, e.g. producing oils from seeds or nuts; extraction of coffee for the production of soluble coffee; decaffeination of tea/coffee; extraction of essential oils
- Extrusion
- Pasteurisation
- Pickling
- Blending
- Processing of flour

Food products which have ingredients added as permitted under article 27 of 889/2008: Additives (as per annex VIII of 889/2008); microorganism and enzymes; natural flavours; legally required vitamins and minerals; drinking water & salt (where addition substantially alters the ingredient).

If a product is imported into GB it would then have to undergo some processing in GB, as defined above, in order to be exported to the EU/NI/EEA under the TCA.

3. Export requirements for products covered by the TCA

Before you arrange a shipment it's important to ensure your supplier holds certification for the product (to the EU regulation or equivalent standard recognised by the EC). See our guidance on checking your supplier's certification [here](#), or contact us with any queries at coi@soilassociation.org.

Who is the exporter?

For details of who can be listed on the COI as the exporter follow this [link](#)

Certificate of Inspection (COI)

A Certificate of Inspection (COI) must accompany all exports of organic produce from GB into the EU or N.I.

NB: Your COI must be endorsed by Soil Association Certification before the consignment leaves GB. Failure to do so may result in your organic goods losing status in the EU, EEA, or NI.

Step 1. Registering on the TRACES NT portal

COIs are issued and managed through the European Commission's online system TRACES NT. If you are the exporter of organic goods from GB, you need to sign up for a TRACES NT account. You can get registered as an exporter, producer, or both. We will then verify that you hold a valid certificate and then your account will be activated.

- First you will need to register for an EU login account. Instructions can be found [here](#)
- Then you will need to request access for your company on the [TRACES NT portal](#)

For further guidance or assistance in getting set up on TRACES please contact coi@soilassociation.org

Step 2. Completing the Certificate of Inspection for SA Certification approval

To ensure that there are no delays to the export of any SA certified product, it is vital that:

1. You pre-purchase COI's through our payment portal [click here](#)
2. Created your COI on TRACES - see instructions [here](#).
3. Submit your COI on the TRACES NT portal **before** the goods leave GB and ensure this approved before the consignments leaves GB.
(You can submit the COI based on draft if the weight or freight information is not ready by the time the goods need to leave)
4. Your importer and 1st Consignee in N.I/EU or EEA are registered on the TRACES NT portal and organically certified.

Our working hours are Monday to Friday 8am to 6pm UK time. Please ensure you submit the COI with as much notice as possible. The COI must be endorsed before the goods leave GB. If you are submitting draft information on your COI, please ensure you send us within our working hours stated above. The updated final net weights and shipping information before the consignment arrives in N.I or EU. Provided that the eligibility criteria as outlined in our T&Cs have been met and the COI submitted by 12pm (Monday to Friday, UK time), where possible we aim to work to a same-day turnaround, however, we are not able to guarantee this service.

We can only endorse a COI if:

- The COI has been submitted via TRACES NT portal
- All the mandatory box with red * on the COI has been completed including **box 17** 'Means of Transport'
- You have uploaded the following supporting documentation so that quantities can be verified.
 - Commercial invoice confirming the net weights
 - Freight information confirming transport of the goods
 - Organic certificate of seller
 - Packing list which has details of your shipment's weight and dimensions
- The products listed are covered by the exporters licence.
- Only the organic products are listed on the COI
- CN codes are used to categorise products if you can't find your exact product description please find the closest one or select 'Other' in most appropriate category. For more information on CN code see [here](#)

Please refer to our full Terms and Conditions [here](#).

Step 3. Endorsement of the COI by the Border Control Posts (BCP) where the consignment clears to enter the EU/NI

It will be the responsibility of the importer in the EU/N.I to notify the relevant border control post ahead of the consignment arriving with a valid COI presented for approval. Failure to do so may result in your organic goods losing their organic status

Step 4. E-Signing of the COI by the first consignee who receives the goods.

The last part of the COI process is when the goods arrive in the EU or N.I and are transported to the first consignee. This is defined as:

..... the natural or legal person to whom the imported consignment is delivered and who will receive it for further preparation and/or marketing

The company receiving the goods in the EU or N.I will need to hold a valid organic licence. Please ensure you ask your importer the details of the 1st consignee to ensure the COI is correct when completing it on the TRACES NT Portal.

Product exported without a valid COI:

In the EU/N. I the Border Control Post (BCP) is responsible for checking the documentation of organic produce at the port of arrival. They have the authority to stop entry of organic produce not accompanied by a valid COI and the goods may be held at port or lose their organic status. The BCP checks that the information on the COI matches with the goods being imported and other documents associated with the shipment such as the Airway Bill or Bill of Lading. If the information is correct, they endorse the COI and the goods will then be cleared to enter the EU or Northern Ireland as organic.

For more information please contact coi@soilassociation.org

In summary: key points to remember:

- The exporter in GB, importer and 1st consignee in EU/NI need to be registered on [TRACES NT](#). If you are an importer based in Northern Ireland or an exporter based in GB, you need to sign up for a TRACES account. We will verify that you hold a valid certificate and then your account will be activated.
- A Certificate of Inspection (COI) needs to accompany **every organic** shipment.
- The exporter must create the COI on TRACES and submit to us for endorsement before the goods leave GB.
- You only need to include organic products on a COI and multiple products from the same consignment can be included on one COI.
- It is the importer's responsibility in the EU/ NI to ensure all the correct paperwork is in place. The importer will need to ensure the **signed paper copy*** is available to present to Port Health Authority/ Border Control Post BCP in N.I/EU. The COI is then signed on TRACES by the PHA/BCP allowing the consignment to clear as organic.
- The first consignee in the EU/N. I will also need to sign the COI on TRACES NT in box 21.

**During COVID-19 pandemic the EC have agreed COIs may be processed based on the electronic copy/TRACES only, with no paper copy required.*

Who is the exporter?

The organic regulation governing imports into the EU, (EC 1235/2008), defines the exporter as: *'the operator performing the last operation for the purposes of preparation as defined in as defined in article 2(i) of Regulation (EC) No 834/2007 on the products mentioned in box 13 and sealing the products in appropriate packaging or containers, pursuant to Article 34 of Regulation (EC) No 889/2008.'*

Preparation is defined as: *'the operations of preserving and/or processing of organic products, including slaughter and cutting for livestock products, and also packaging, labelling and/or alterations made to the labelling concerning the organic production method.'*

This means that without carrying out any preparation of the product, a company cannot be listed as the exporter on the COI. However, if additional labelling is applied by the exporter to each consignment this will

meet the definition of preparation and the requirements for completing a COI. If this applies to your business view the guidance for labelling below.

Guidance for labelling the export consignment:

The exporter applies additional labelling to the consignment with a new lot number and our certification code GB-ORG-05. If this option is taken it is essential, you follow the guidance below before export.

There are two options for issuing a new lot number for the export consignment. The retail labels will not need to be changed for either option.

- a) **Each product in the consignment is given its own new lot number** (different from the lot/batch number on the individual product labels)
- A label is applied to the pallet/transport packaging listing the new lot numbers and the code GB-ORG-05. We don't need to review these labels before they are applied.
 - On the COI in the description of products (Box 13) you can list the different products by CN code and add the new lot number in the LOT number box as shown below.
 - The new lot numbers must be traceable and link with accompanying documentation (e.g. invoices /delivery/packing notes) and with the lot/batch codes on the product packaging.
 - Your systems must be able to easily show traceability of the new lot number of each product in the consignment listed on the COI

OR

- b) **A new lot number is given to the whole consignment** (rather than to each individual product that make up the consignment).
- A label is applied to the pallet/transport packaging listing the new lot number and the code GB-ORG-05. We don't need to review these labels before they are applied.
 - The different products listed in the COI are all given the same lot number assigned for the whole consignment.
 - The new lot number must be traceable and link with accompanying documentation (e.g. invoices /delivery/packing notes) and must link with each of the individual products and their lot/batch codes (which are on the product labels).
 - Your systems must be able to easily show traceability of the new lot number to each product in the consignment listed on the COI

Useful links:

[Traces log in](#)
[COI workflow](#)