



## Exporting Organic Products to the EU, EEA, or Northern Ireland

The following information applies to farmers and growers, manufacturers, packers, brandholders and traders certified by Soil Association Certification Ltd.

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](#).

You will need to make sure all the products you are planning to export are on your trading schedule.

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

### 1. Scope of the UK-EU Trade Cooperation Agreement (TCA).

The TCA covers products which are grown/produced or processed in the UK or imported into UK 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 UK
Live animals or unprocessed animal products (including honey)	Produced/grown in UK
Aquaculture products and seaweeds	Live or unprocessed produced/grown in UK
Processed agricultural products for use as food	Only if processed in UK
Processed agricultural products for use as feed	Only if processed in UK
Seeds and propagating material	Produced/grown in UK

Products imported into GB from 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. If product is moved to GB from Northern Ireland (NI) then to be eligible for export from GB to the EU, it must have been produced or processed in NI, or processed in GB after importing from NI.

## 2. Definition of Processed Products

Organic regulation 889/2008 and EC 848/2018 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.

**This means the following activities would be classed as unprocessed:**

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

**The following activities would be classed as processed:**

- Deodorising oil (involves heating so can be considered processed)
- Anything where product is heated, dried, cooked, roasted or smoked e.g. would include packing of imported honey where honey is heated
- 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 e.g. herbs, spices, tea
- Mixing ingredients together
- Processing of flour
- Food products which have ingredients added as permitted under article 27 of 889/2008 (in the EU regulation 2021/1165): Additives; microorganism and enzymes; natural flavours; legally required vitamins and minerals; drinking water & salt. e.g. Tea with flavourings added
- Filtering of oil (decided on a case by case basis)
- Grinding nuts into nut butters

- Controlled ripening of bananas
- Powdering
- Use of Nitrogen, Carbon dioxide or Argon when bottling wine (also referred to as 'sparging').
- Tea into teabags
- Granulating

If you are unsure if your product can be covered by the scope of the TCA please contact the COI team ([coi@soilassociation.org](mailto:coi@soilassociation.org))\_with as much information on the processing activities that are involved with your product.

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

### **3. Documentation required for export**

#### **Exports to EU /EEA**

A Certificate of Inspection (COI) must accompany all exports of organic product from GB into the EU or EEA. These must be issued before the consignment leaves GB.

#### **Exports to NI**

A [COI](#) is not required for export to NI of prepacked retail goods, and certain loose goods including fruit and vegetables, provided they are covered by the [Northern Ireland Retail Movement Scheme](#) (ReMoS).

All other goods moving from GB to NI require a COI. For example, products for onward sale in the EU, or that are intended for further processing or packing in NI, animal feed and agricultural seed. For these goods the [Movement Assistance Scheme \(MAS\)](#) is available until June 2025 to cover the cost of your certifier endorsing COIs for exports from GB to NI.