

Introduction

Imports of organic products to the EU need to be accompanied by a Certificate of Inspection (COI), confirming that the product has been produced in accordance with organic production rules equivalent to the EU organic regulations. For each consignment, one COI is required. The COI must be available before the consignment leaves the country of export or origin. Without a COI issued by the certification body of the last operator in the third country in the EU online tool Traces, together with a signed original document, products may not be customs' cleared as organic in the EU (Reg. Nos. (EC) 834/2007 and 1235/2008).

For organic imports to the US, there is no general requirement for COIs in the NOP. However, some importers may request it as a quality assurance tool. Further, the NOP requires it for certain products from certain countries (as described in chapter 1).

A COI has to be requested by the operator performing the last operation of preparation on a lot (preservation, processing, packaging, labelling, sealing the goods in packaging or containers). Pure trade agents do not appear in the COI.

Chapter 1, Documents needed to request a COI

For all requests:	<ul style="list-style-type: none"> Request form 24_054, please find it on our webpage, Request for Issuance of a COI Sales invoice Delivery note/ bill of lading/ waybill (outgoing goods) Seal list (if applicable)
Additionally, for sales of purchased products, bought from a producer certified by bio.inspecta:	<ul style="list-style-type: none"> Invoice (incoming goods) Waybills (incoming goods)
Additionally, for sales of purchased products, bought from a producer certified by another certification body:	<ul style="list-style-type: none"> Valid certificate – supplier listed in the data sheet/OSP Invoice (incoming goods) Waybills (incoming goods) Domestic transaction certificate (issued by the certification body of the supplier)
Additionally, for exports (irrespective from which country) to the EU of products with CN-Codes Chapter 10, 11, 12, 23 (e.g. cereals, oil seeds; miscellaneous grains; for details ref. ¹⁾), originating from Kazakhstan, Moldova, Russian Federation, Ukraine :	<ul style="list-style-type: none"> Information on sampling/analysis is assessed. Refer to chapter 3. Time needed between ordering sampling and receipt of analysis results is at least 2 weeks. bio.inspecta informs you once analysis results are received. Submit the request for COI 25_054 in time once information is available. COIs shall accompany the goods, and shall be issued before the shipment leaves the country of origin or export (refer to administrative information below, about time needed to issue a COI).
Additionally, for exports to the US of grain, oil seeds, and products of these (like sunflower meal) from Armenia, Bulgaria, Georgia, Kazakhstan, Moldova, Romania, Russia, Turkey, or Ukraine : <i>Please mind that APHIS requires fumigation at the border for certain commodities. This will lead to a</i>	<ul style="list-style-type: none"> Information on sampling/analysis is assessed. Refer to chapter 3. Time needed between ordering sampling and receipt of analysis results is at least 2 weeks Submit the request for COI 25_054 in time once the documents are available. Phytosanitary certificate

declassification of the products. For certain commodities APHIS prohibits the import at all. This list changes very often. Therefore bio.inspecta recommends to clarify the current situation with the buyer in the USA.

Chapter 2, COI issuing procedure

For all requests:	<ul style="list-style-type: none"> • Submit the request form 24_054 together with relevant documents. In order to ensure that the COI is issued before the consignment leaves the country, it may be issued based on draft transport papers. • Submit original transport papers as soon as they are available, but within 5 days from the issuance of the COI and, in any case, before customs clearing in the EU. Only upon receipt and verification, bio.inspecta will issue the paper version of the COI, which is required for customs' clearing.
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Chapter 3, Additional requirements for countries/ products where analysis results are required

For concerned export consignments, bio.inspecta must take at least one representative sample. Sampling explicitly is required to be done by the certification body (or by an independent third party surveyor contracted by the certification body respectively), not by the operator. The samples must be analysed and assessed prior to issuing the requested COI (depending on the products on different pesticide scopes and GMO). The sampling needs to be done at the place in the country where the last handling (e.g. packing of big bags, loading of bulk) takes place. It needs to be done during or immediately before loading, in order to eliminate the risk of contamination after sampling. For each sales lot, one sampling is needed.

For exports in trucks, by default, 1 COI is issued per truck, one sampling and one analysis done. Certain EU countries or district authorities allow that one COI is issued for several trucks travelling in convoy. In such a case the operator is responsible to obtain confirmation by the importer and its certification body as well as import authorities that one COI will be accepted for several trucks travelling in convoy.

Please note that sampling is done according to Reg. (EU) 691/2013, which means for goods in bulk or big bags either the size of a sample does not exceed 500 t, or, for samples >500 t, incremental samples are increased to 40+√tonnes (for substances uniformly distributed); 100+√tonnes (for substances non-uniformly distributed).

The analysis result will be sent to bio.inspecta with a copy to the customer. The invoice of the sampling/analysing institute is received by the client.

How to request sampling and analysis:

Request sampling at bio.inspecta	<ul style="list-style-type: none"> • Order sampling at bio.inspecta with request form 25_053, please find it on our webpage, Request for Export Consignment Sampling <ul style="list-style-type: none"> • In the form, chose among the following laboratories: <ul style="list-style-type: none"> Eurofins bilacon GmbH Galab • In the form, chose among the following surveyors: <ul style="list-style-type: none"> Navi Mar LLC, Ukraine "International Testing" LLC (may subcontract the sampling), Ukraine Galab representative in Ukraine SGS Moldova
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	<ul style="list-style-type: none"> • SGS Kazakhstan Baltic Control Kazakhstan Please give clear indication where, and at which time, sampling has to be done
<p>If there are justified reasons, why sampling at the place of final handling is not possible, the following is required:</p>	<ul style="list-style-type: none"> • Justification why this is not feasible • Confirmation that the operator engages an independent third party surveyor (GAFTA member), to do additional sampling during final loading at port (aim is to have a sample available for analysis in case there would be any finding of residues during import) • The reports of the surveyor (sampling, inspection, photo) are submitted to bio.inspecta as soon as they are received (may be after issuing the COI)

Administrative information

All applications for COIs should arrive at international@bio-inspecta.ch.

On weekdays, COIs are issued

- the same day if complete application arrives prior 12.00am (CET)
- the next day if complete application arrives later than 12.00am (CET)
- no COI are issued on Saturday and Sunday
- incomplete requests will be returned to sender with the request to complete

For urgent delivery: Inform us to send the COI by DHL

Sampling, transport of samples and analysis usually takes 10 to 14 days (depending on possible detection of substances, the laboratory's procedure may take longer). Laboratories offer express services at extra charge.

Please provide your COI requests as timely as possible, in order to ensure that COIs are issued before the product leaves the country of origin or export, and to have sufficient time, if any clarifications are needed before issuing the COI.

1) Concerned CN-Codes:

Concerns products of the following CN codes

- Chapter 10, cereals
- Chapter 11, products of the milling industry; malt; starches; inulin; wheat gluten. The following CN codes are excluded: CN codes 1105, 1106, 1107, 1108, 1109
- Chapter 12, oil seeds and oleaginous fruits; miscellaneous grains, seeds and fruit; industrial or medicinal plants; straw and fodder, with the exception of processed products ready for human consumption derived from them. The following CN codes are excluded: CN codes 1211, 1212, 1213, 1214
- Chapter 23, residues and waste from the food industries, prepared animal fodder. The following CN codes are excluded: CN codes 2307