

COIs for Imports of Organic Products into the EU (+ EEA, CH and NI)

Abbreviations

AWB	A ir W aybill	Official air transport document
B/L	B ill of L ading	Official maritime transport document
CMR	C onvention Relative au Contrat de Transport International de M archandises par R oute	Official road transport document
COI	C ertificate of I nspection	Previously called "TC = Transaction Certificate"
ETD	E stimated T ime of D eparture	With regard to COI applications, meaning the day when the goods are going to leave the <u>country of export</u>
TRACES	T rade C ontrol and E xpert S ystem	Official traceability system for organic imports into the EU
EU-COI	Meaning the official COI that is mandatory for imports into the EU, EEA, CH and NI	

1. Introduction

The European Union (as well as the whole European Economic Area (EEA), Switzerland (CH) and Northern Ireland (NI)) requires Certificates of Inspection (COI, also called transaction certificates) for each import of organic products from third countries. In 2016, Regulation (EC) 1235/2008 was amended with the purpose of improving the traceability of organic products, reducing potential fraud, and obtaining information about imported quantities of organic products. Since October 2017 all COIs for organic imports into the EU (as well as the whole EEA, CH and NI) must be issued via the online platform TRACES (Trade Control and Expert System, implemented and managed by the EU).

Since 01.01.2022 the import procedures, including COI issuance, are following the new Regulation (EU) 2018/848. The new import procedures and COI issuance are described specifically in Delegated Regulations (EU) 2021/2305 and 2021/2306 as well as Implementing Regulation (EU) 2021/2307.

In 2020 the EU Commission has approved the **electronic signatures** for the certifiers. **Since 15 July 2020, EU-COIs are no longer issued on paper by CERES but electronically in form of a digitally signed PDF original.** These are called "e-COI". **The digital signature (e-seal) fully replaces the manual signature and stamp.** Waiting times and extra costs related to sending hard copy COIs are thus obsolete, the e-COI is immediately available on TRACES for all authorities and operators involved in the import.

For the transition period until using the e-Seal becomes fully mandatory, the EU Commission has determined that in case an e-COI must be endorsed on paper by hand signature (because the competent authority does not use the e-Seal yet), the digitally issued e-COIs with e-Seal shall simply be printed out and the print-out be endorsed by hand signature. (See Delegated Regulation (EU) 2021/2306, Article 11 (2b)).

2. How it works

1 st Step	Importer or control body of the last preparer creates the COI on TRACES.
2 nd Step	Control body responsible for the operator who carries out the last preparation activity (in this case CERES) issues the COI; the e-COI is available in real time for the respective customs authority. The COI must be issued before the goods leave the country of export!
3 rd Step	<u>After</u> the COI has been issued by the control body, the goods can be dispatched.
4 th Step	The competent authority in the member state endorses the COI through their (electronic) signature.
5 th Step	Once the COI has been endorsed by the competent authority, customs can release the goods for free circulation.
6 th Step	First consignee (electronically) signs the declaration at the end of the COI.

3. Timeline for Issuing the COI

With an update to Regulation (EC) 1235/2008 from January 2020, the Commission decided that **EU-COIs must be issued before the organic product leaves the country of export.** This is also maintained in the new Regulation (in force since 01.01.2022), as determined in Delegated Regulation (EU) 2021/2306, Article 4 (1).

This means:

- a. **All EU-COIs must be issued before the goods leave the country of export.** Once the shipment has departed it is generally no longer possible to issue an EU-COI for this shipment.
It is the responsibility of the exporter to make sure that the shipment does not leave the country of export before the EU-COI is issued.
- b. The exporter must **apply for the EU-COI as early as possible with enough time for CERES to check the documents and rule out any doubts before the shipment.** Please take into account our usual handling times for COI-applications and, in case an application cannot be submitted with sufficient time in advance, also consider using the EXPRESS service option that we offer for all national sales as well as international shipments by vessel or train (NOT applicable for international air- and land freight; generates additional costs, see our price list).

For international vessel (and train) shipments the application should be sent at least 6-10 working days prior to the shipment. International air- and land freight should be submitted at least 2-5 working days before the shipment and need to be marked as Flight/AWB or Truck/CMR in the subject line of the email so that they can be handled with priority. ("Working days" do not include weekends and national holidays.)

Please **carefully check our [General guidance for COI / TC applications](#)** (available on our website under Documents > COI/TC) for a summary of the most important aspects regarding COI / TC applications (all types) as well as an overview of handling times and service options.

This is crucial to avoid unnecessary delays and misunderstandings.

- c. In case the official waybill (B/L, CMR or AWB) and commercial invoice are issued only after the vessel has departed, **we also accept draft versions of the waybill (or booking confirmations) and proforma invoices for COI issuance.**

In case it is actually impossible to provide a (draft) waybill (B/L, CMR or AWB) and/or (proforma) invoice in time for the application, we will accept the application without this document.

In case there is no (draft) waybill (B/L, CMR or AWB) at the time of issuance, the COI will, of course, not include any shipment details (i.e. boxes 14,15 and 17 for container number, seal number and means of transport will remain empty).

Once the original waybill (B/L, CMR or AWB) and commercial invoice are available, please send them immediately, so we can update the e-COI on TRACES with the relevant shipment details and upload the documents.

Boxes 10, 14 - 17 as well as the net weight and packages in box 13 of the e-COI can be modified by the issuing control body (CERES) in TRACES after the COI has been issued and before it has been endorsed by the EU competent authority. Boxes 10, 19, 20 and 24 can be modified by the importer (or their representative in case this one is included in box 19) within the same time frame. The digitally signed PDF of the COI will remain unchanged because it is the original and originals cannot be modified. However, all modification are valid and available on TRACES.

The shipment details shall be included in the COI on TRACES within a maximum of 10 days (from the date of the signature in box 18) **and in any case before endorsement of the COI by the relevant Member State's competent authorities.** This deadline has been given by the EU Commission; it is not a CERES deadline. (See Commission Delegated Regulation (EU) 2021/2306, Article 5 (3))

- d. Please make sure to **include the correct ETD as well as the transport mode (BL / AWB / CMR) in the subject line** of your email when sending in the application. (Remember that ETD with regard of COI applications means the estimated date **when the product leaves the country of export.**)

In case of international shipments by vessel or train, please also mention the applicable service option (**EXPRESS** or **STANDARD**).

A correct and complete subject line is crucial to make sure that your application is correctly prioritized and issued in time. Missing details may lead to delays and confusions and thus cause inconveniences for all sides. For this reason, we are asking for your kind support to enable a smooth COI issuance.

See detailed instructions and in our [General guidance for COI / TC applications](#) (available on our website under Documents > COI/TC).

- e. We request the exporter to send us the **final version of the B/L and the commercial invoice as soon as these documents are available.** CERES will not be responsible for any delays in entering the missing data, such as Container or B/L information in case of not receiving these documents in time (information can only be completed in TRACES prior to customs clearing). This needs to be an automatic process without the need for CERES to send reminders. **If we do not receive the relevant documents even after sending a reminder, we may stop issuing new COIs.**

In case of **changes between application / proforma / draft and original (final) version** of invoice or waybill (B/L, CMR or AWB), **it is the responsibility of the exporter to actively inform us about this when sending the final**

documents.

- f. Since 01.01.2022 it is **mandatory to upload the following documents for the COI on TRACES:**
- the commercial and transport documents (such as invoices, packing lists and waybill (B/L, CMR or AWB))
 - Where applicable, the results of sample analyses
 - Once the transition period for equivalent certification in third countries has ended (currently planned to expire 31.12.2024), bulk shipments will additionally need a travel plan.
(This requirement only applies for certifications by a control body/authority recognized in accordance with Article 46 of Regulation (EU) 2018/848, i.e. NOT if the goods are certified for a national standard of a country that is recognized as equivalent or under a trade agreement.)

We do this automatically when we receive the respective documents.

- g. This procedure **only applies to imports from third countries into the EU** (as well as the whole European Economic Area (EEA), Switzerland (CH) and Northern Ireland(NI)).

For details regarding other COIs / TCs, please see our [General guidance for COI / TC applications](#) (available on our website und Documents > COI/TC).

4. Who can use TRACES










Access to TRACES is granted to:

- Issuing Body (**Control Body** responsible for the third country exporter)
- Commission and Member State's Competent Authority
- Importers
- First consignees
- Responsible Control Bodies in Member States
- Technically, exporters can be granted access to TRACES, too. However, this is generally not necessary for clients of CERES because we manage all TRACES related tasks for you.

5. Which Control Body (CB) issues the COI?

Per Art. 3 of Regulation (EU) 2021/2306, the **COI shall be issued "by the (...) control body of the operator (...) carrying out the last operation for the purposes of preparation (...)".** Generally, this means the control body of the operator who did the last labelling activity before export.

Examples:

	Producer	Last Processor	Exporter / Trader	COI by
a.	Banana farmer  Certified by CERES	The bananas are packed on the farm  Certified by CERES	The exporter / trader does not process, repack or re-label the product  Certified by CB X	CERES
b.	Vineyard  Certified by CERES	Winery  Certified by CB X	The winery exports the wine itself 	CB X
c.	Rice farmer group  Certified by CB X	Rice mill  Certified by CB Y	Exporter buys and sells, but does not get in touch with the rice  Certified by CERES	CB Y

Following the same logic, the EU defines the **country of export** as "the country where the product has been subject to the **last operation for the purpose of preparation (...)**". (See Commission Regulation (EU) 2021/2306 Annex Part II)

The COI model and corresponding explanatory notes (as determined in Regulation (EU) 2021/2306 Annex Part I and II) are added at the end of this document.

Please also note that, according to the EU regulation, **packing and labelling cannot be considered as processing operations. (They are only preparation operations.)**

Consequently, an operator that only (re-)packs and/or (re-)labels a product (without performing any actual processing or agricultural production) cannot appear as processor or producer in an EU- or GB-COI, only as exporter.

We are obligated to mention the actual processor or agricultural producer of the product in box 4 of EU-COIs.

6. Official EU-COI layout, notes and definitions

(see Commission Regulation (EU) 2021/2306 Annex for a full version including footnotes)

CERTIFICATE OF INSPECTION FOR THE IMPORT OF ORGANIC AND IN-CONVERSION PRODUCTS INTO THE EUROPEAN UNION

1. Issuing control authority or control body		2. Procedure pursuant to Regulation (EU) 2018/848 of the European Parliament and of the Council: <input type="checkbox"/> Compliance (Article 46); <input type="checkbox"/> Equivalent third country (Article 48); <input type="checkbox"/> Equivalent control authority or control body (Article 57) <input type="checkbox"/> Equivalence under a trade agreement (Article 47).					
3. Certificate of inspection reference number		4. Producer or processor of the product					
5. Exporter		6. Operator who buys or sells the product without storing or physically handling the product					
7. Control authority or control body		8. Country of origin					
9. Country of export		10. Border control post/point of release for free circulation					
11. Country of destination		12. Importer					
13. Description of products							
Organic or in-conversion	CN code	Trade name	Category	Number of packages	Lot number	Net weight	
14. Container number		15. Seal number			16. Total gross weight		
17. Means of transport							
Mode							
Identification							
International transport document							
18. Declaration of the control authority or control body issuing the certificate referred to in box 1 This is to certify that this certificate has been issued on the basis of the checks required under Commission Delegated Regulation (EU) 2021/1698 for compliance (Article 46 of Regulation (EU) 2018/848) or Commission Delegated Regulation (EU) 2021/1342 for equivalence (Article 47, 48 or 57 of Regulation (EU) 2018/848) and that the products designated above are in line with the requirements of Regulation (EU) 2018/848 Date Name and signature of authorised person /qualified electronic seal Stamp of issuing control authority or control body							

19. Operator responsible for the consignment	
20. Prior notification	
Date	Time
21. For transfer to:	22. Details of the control point
23. Special customs procedures	
Customs warehousing <input type="checkbox"/> Inward processing <input type="checkbox"/>	
<p>Name and address of the operator responsible for the customs procedure(s):</p> <p>Control authority or control body certifying the operator responsible for the customs procedure(s):</p> <p><input type="checkbox"/> Verification of the consignment prior to the special customs procedure(s)</p> <p>Additional information:</p> <p>Authority and Member State:</p> <p>Date:</p> <p>Name and signature of authorised person</p> <p>Customs Declaration Reference Number for the customs procedure(s)</p>	
24. First consignee in the European Union	
25. Control by the relevant competent authority	
Documentary checks	
<input type="checkbox"/> Satisfactory <input type="checkbox"/> Not satisfactory	
Selected for identity and physical checks	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
Authority and Member State:	
Date:	
Name and signature of authorised person/qualified electronic seal	
26. For transfer from the border control post to a control point:	27. Details of the control point

<input type="checkbox"/> Yes <input type="checkbox"/> No	
28. Means of transport from the border control post to a control point	
29. Identity and physical checks	
Identity checks <input type="checkbox"/> Satisfactory; <input type="checkbox"/> Not satisfactory;	
Physical checks <input type="checkbox"/> Satisfactory; <input type="checkbox"/> Not satisfactory;	
Laboratory test <input type="checkbox"/> Yes <input type="checkbox"/> No	
Test result <input type="checkbox"/> Satisfactory <input type="checkbox"/> Not satisfactory	
30. Decision by the relevant competent authority	
<input type="checkbox"/> To be released as organic; <input type="checkbox"/> To be released as in-conversion; <input type="checkbox"/> To be released as non-organic; <input type="checkbox"/> The consignment cannot be released for free circulation; <input type="checkbox"/> Part of the consignment can be released for free circulation.	
Additional information: Authority at border control post/control point/point of release for free circulation and Member State: Date: Name and signature of authorised person/qualified electronic seal	
31. Declaration of the first consignee	
This is to confirm that at the reception of the products, the packaging or container and, where relevant, the certificate of inspection are:	
<input type="checkbox"/> in accordance with point 6 of Annex III to Regulation (EU) 2018/848; or <input type="checkbox"/> not in accordance with point 6 of Annex III to Regulation (EU) 2018/848.	
Name and signature of the authorised person	Date:

NOTES FOR THE COMPLETION OF THE MODEL OF THE CERTIFICATE OF INSPECTION

Boxes 1 to 18 must be completed by the relevant control authority or control body in the third country.

Box 1: Name, address and code of the control authority or control body recognised pursuant to Article 46 or referred to in Article 57 of Regulation (EU) 2018/848 or a control authority or control body designated by a competent authority of a third country referred to in Article 47 or 48 of that Regulation. This control authority or control body also completes boxes 2 to 18.

Box 2: This box indicates the provisions of Regulation (EU) 2018/848 that are relevant for the issue and use of this certificate; indicate the relevant provision.

Box 3: Number of the certificate automatically assigned by the electronic Trade Control and Expert System (TRACES).

Box 4: Name and address of the operator(s) who produced or processed the products in the third country mentioned in box 8.

Box 5: Name and address of the operator exporting the products from the country mentioned in box 9. The exporter is the operator performing the last operation for the purposes of preparation as defined in Article 3, point (44), of Regulation (EU) 2018/848 on the products mentioned in box 13 and sealing the products in appropriate packaging or containers, pursuant to point 6 of Annex III to Regulation (EU) 2018/848.

Box 6: Where applicable, fill in name and address of one or more operators who buy or sell the product without storing or physically handling the product.

Box 7: Name and address of the control body(ies) or authority(ies) for monitoring compliance of the production or processing of the products with the rules on organic production in the country mentioned in box 8.

Box 8: Country of origin means the country(ies) where the product has been produced/grown or processed.

Box 9: Country of export means the country where the product has been subject to the last operation for the purpose of preparation as defined in Article 3, point (44), of Regulation (EU) 2018/848 and sealed in appropriate packaging or containers.

Box 10: In case of consignments subject to official controls at border control posts pursuant to Article 45(5) of Regulation (EU) No 2018/848, indicate the name and the unique alphanumeric code assigned by TRACES to the border control post of first arrival into the Union, at which official controls are performed in accordance with Article 6(1) of Commission Delegated Regulation (EU) 2021/2306.

In case of consignments exempted from official controls at border control posts in accordance with Article 3 of Commission Delegated Regulation (EU) 2021/2305, indicate the name and the unique alphanumeric code assigned by TRACES to the point of release for free circulation into the European Union, as appropriate, where official controls are performed in accordance with Article 6(1) of Commission Delegated Regulation (EU) 2021/2306.

The information in this box can be updated by the importer or its representative prior to the arrival of the consignment at the border control post or at the point of release for free circulation, as appropriate.

Box 11: Country of destination means the country of the first consignee in the European Union.

Box 12: Name, address and the Economic Operators Registration and Identification (EORI) number, as defined in Article 1, point (18), of Commission Delegated Regulation (EU) 2015/2446, of the importer, as defined in Article 2, point (1), of Commission Implementing Regulation (EU) 2021/2307, who presents the consignment for release for free circulation either on its own, or through a representative.

Box 13: Description of the products, which includes:

- the indication whether the products are organic or in-conversion;
- the Combined Nomenclature (CN) code as referred to in Council Regulation (EEC) No 2658/87 for the products concerned (8-digit level where possible);

- the trade name;
- the category of the product in accordance with Annex II to Commission Implementing Regulation (EU) 2021/1378;
- the number of packages (number of boxes, cartons, bags, buckets, etc.);
- the lot number; and
- the net weight.

Box 14: Container number: optional.

Box 15: Seal number: optional.

Box 16: Total gross weight expressed in appropriate units (kg, litre, etc.).

Box 17: Means of transport used from the country of origin until the arrival of the product at the border control post or the point of release for free circulation for the verification of the consignment and endorsement of the certificate of inspection.

Mode of transport: aeroplane, vessel, railways, road vehicle, other.

Identification of the means of transport: for aeroplane, the flight number, for vessels, the ship name(s), for railways, the train identity and wagon number, for road transport, the registration number plate with trailer number plate if appropriate.

In the case of ferry, indicate vessel and road vehicle with the identification of the road vehicle and of the scheduled ferry.

Box 18: Declaration of the control authority or the control body issuing the certificate. Choose the appropriate Commission Delegated Regulation. The hand signature of the authorised person and the stamp are required only in the case of certificates of inspection issued on paper until 30 June 2022 in accordance with Article 11(1) of Delegated Regulation (EU) 2021/2306.

Box 19: Name, address and the EORI number, as defined in Article 1, point (18), of Delegated Regulation (EU) 2015/2446, of the operator responsible for the consignment, as defined in Article 2, point (2), of Implementing Regulation (EU) 2021/2307. This box must be completed by the importer indicated in box 12, if the operator responsible for the consignment is different from that importer.

Box 20: In case of a consignment of products intended to be placed on the Union market as organic products or in-conversion products subject to official controls at border control posts pursuant to Article 45(5) of Regulation (EU) 2018/848, indicate the estimated arrival date and time at the border control post.

In case of a consignment of products exempted from official controls at border control posts pursuant to Commission Delegated Regulation (EU) 2021/2305, indicate the estimated arrival date and time at the point of release for free circulation in accordance with that Regulation.

Box 21: To be completed by the importer, or where appropriate the operator responsible for the consignment, to request the transfer of the products to a control point in the Union for further official controls, if the consignment is selected for identity and physical checks by the competent authorities at the border control post. This box applies only to products subject to official controls at border control posts pursuant to Article 45(5) of Regulation (EU) 2018/848.

Box 22: Indicate the name of the control point in the Member State to which the products are to be transferred for identity and physical checks if the consignment is selected for such checks by the competent authorities at the border control post. To be completed by the importer or, where appropriate, by the operator responsible for the consignment. This box applies only to products subject to official controls at border control posts pursuant to Article 45(5) of Regulation (EU) 2018/848.

Box 23: This box must be completed by the relevant competent authority and the importer.

In case of products subject to official controls at border control posts, this box must be completed by the competent authority at the border control post. The hand signature of the authorised person is required in the case of certificates of inspection endorsed on paper until 30 June 2022 in accordance with Article 11(2) of Delegated Regulation (EU) 2021/2306.

Box 24: Name and address of the first consignee in the European Union. This box must be completed by the importer.

Box 25: This box must be completed by the competent authority after the performance of the documentary checks in accordance with Article 6 of Delegated Regulation (EU) 2021/2306. In case the documentary checks are not satisfactory, box 30 must be completed.

That authority must indicate whether the consignment is selected for identity and physical checks.

The signature of the authorised person/qualified electronic seal is only required if the competent authority is different from the authority indicated in box 30. The hand signature of the authorised person is required only in the case of certificates of inspection endorsed on paper until 30 June 2022 in accordance with Article 11(2) of Delegated Regulation (EU) 2021/2306.

Box 26: To be completed by the competent authority at the border control post if the consignment is selected for identity and physical checks and if the consignment is acceptable for transfer to the control point for further official controls. This box applies only to products subject to official controls at border control posts pursuant to Article 45(5) of Regulation (EU) 2018/848.

Box 27: In case of transfer to a control point, indicate the name of the control point in the Member State to which goods are requested to be transferred for identity and physical checks, its contact details and the unique alphanumeric code assigned by TRACES to the control point. To be completed by the competent authority at the border control post. This box applies only to products subject to official controls at border control posts pursuant to Article 45(5) of Regulation (EU) 2018/848.

Box 28: Please see guidance on box 17. This box must be filled in in case the consignment is transferred to a control point for identity and physical checks.

Box 29: This box must be completed by the competent authority in case the products are selected for identity and physical checks.

Box 30: This box must be completed by the competent authority, after the preparations referred to in Article 7(1) of Delegated Regulation (EU) 2021/2306, where applicable, and in all cases after the verification of the consignment in accordance with Article 6(1) and (2) of that Regulation.

The competent authority must select the appropriate option adding, if necessary, any additional information considered relevant. In particular, if the option “The consignment cannot be released for free circulation” or “Part of the consignment can be released for free circulation” has been selected, the relevant information must be provided under “additional information”.

In case of products subject to official controls at border control posts, this box must be completed by the competent authority at the border control post. In case the consignment is transferred to a control point for identity and physical checks referred to in Article 6 of Delegated Regulation (EU) 2021/2306, this box must be completed by the competent authority at that control point.

Under ‘authority at border control post/control point/point of release for free circulation’, fill in the name of the authority concerned, as appropriate.

The hand signature of the authorised person is required only in the case of certificates of inspection endorsed on paper until 30 June 2022 in accordance with Article 11(2) of Delegated Regulation (EU) 2021/2306.

Box 31: This box must be completed by the first consignee at the reception of the products after the release for free circulation by selecting one option after carrying out the checks provided for in point 6 of Annex III to Regulation (EU) 2018/848.

The hand signature of the first consignee is required for certificates of inspection endorsed on paper until 30 June 2022 in accordance with Article 11(2) of Delegated Regulation (EU) 2021/2306.