

Production, preparation, and export of organic plant products into the European Union

Guidance for operators
and groups of operators

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ABBREVIATIONS

CB	control body
COI	Certificate of Inspection
COLEAD	Committee Linking Entrepreneurship-Agriculture-Development
EGTOP	Expert Group for Technical Advice on Organic Production, European Commission
EU	European Union
FiBL	Research Institute of Organic Agriculture/Forschungsinstitut für biologischen Landbau
GMO	genetically modified organism
ICS	internal control system
NOP	National Organic Programme, USA
OFIS	Organic Farming Information System, European Commission
PRM	plant reproductive material
TRACES	Trade Control and Expert System, EU

ABOUT THIS GUIDE

This guide is intended for producers, groups of operators (producer groups), processors, and exporters of organic plant products in countries outside the European Union (EU) who want to export organic products to the European market. It explains the rules that apply for organic plant production, simple preparation/processing, storage, and export of organic products by individual “operators” (plantations, farms, processors/exporters) and by groups of operators (producer organisations, producer groups).

More specifically, the guide is written for operators and groups of operators who are located in a non-EU country whose organic control system is not recognised by the EU for organic imports, and therefore who need to be certified in compliance with the Organic Regulation (EU) [2018/848](#). It focuses on the requirements for organic production in low- and middle-income countries, where production systems are different from those in the EU.

The EU Organic Regulation 2018/848 is a legal act of the European Union, embedded in the EU’s wider regulatory framework. This guide aims to explain the legal requirements of the Regulation in simplified form for producers, producer groups, processors, and exporters in non-EU countries. It gives references to legal texts to help users find the relevant applicable regulatory text. Note that it is not an official interpretation by the European Commission. This guide will continue to evolve as the EU, Member States, or EU courts continue to introduce new secondary acts, additional measures, or rulings to Regulation 2018/848.

Control bodies (CBs) in non-EU countries must be officially recognised by the EU before they can conduct organic certifications according to the Organic Regulation. Control bodies have policies and procedures in place on how to assess and certify compliance with the legal requirements, based on their analysis of the legal texts and official guidance. It is very important for operators and groups of operators to always check detailed requirements under the new rules with their CB as they prepare for certification.

This guide does not cover livestock or aquaculture production rules, or complex processing (of food or feed with multiple ingredients). It provides only a brief overview of the organic control system for imports into the European Union.

1. INTRODUCTION TO THE ORGANIC REGULATION AND THE NEW COMPLIANCE SCHEME FOR IMPORTED ORGANIC PRODUCTS

1.1 Regulation 2018/848 and its application in third countries

The Organic Regulation (EU) [2018/848](#) is the basic Act that lays down the European Union (EU) rules on organic production and labelling of organic products. It was introduced to revise and strengthen the organic controls system, trade regime, and production rules that had been in place since 2007 under Regulation (EC) [834/2007](#). It has applied in the EU from January 2022, but for third countries (countries outside the EU) there have been longer transition periods for the application of some of the new rules.

The new organic regime has the stated aims of encouraging the sustainable development of organic production in the EU, guaranteeing fair competition for (EU) farmers and operators, preventing fraud and unfair practices, and improving consumer confidence in organic products in Europe.

While the focus is on the EU organic sector, it also has significant implications for non-EU countries that are exporting to the European market. For these countries, it has fundamentally changed the regulatory approach. The earlier Regulation (EC) 834/2007 was based on the principle of equivalence, whereby organic goods could be produced in ways that were different from the EU, as long as they gave an equivalent outcome, and were aligned with organic principles. The new Organic Regulation is based on the principle of compliance, which requires producers in non-EU countries to conform to the same set of rules as those used in the EU (except in countries where their organic control system is recognised by the EU via a trade agreement). This is intended to be fair for all producers, as everyone has to meet the same standards.



Background, history, and overview on the new EU Organic Regulation 2018/848
→<https://agrinfo.eu/book-of-reports/new-eu-organic-regulation-explained/>

The new EU organic rules under Regulation 2018/848 still give two options for the certification of organic products exported from non-EU countries into the European Union. Products can either be:

- certified in accordance with the national organic rules in a country where the organic legislation is fully or partially recognised¹ as equivalent to the EU organic legislation, or by trade agreement

or

- certified in compliance with the EU Organic Regulation itself.

It is important to note that, in a given country, generally only one of these two options applies, but there is an exception in countries with partial recognition, where there may be a mixture of both. In India, for example, there is equivalence recognition for the production of unprocessed plant products, which are certified under the Indian National Programme for Organic Farming. There is no equivalence recognition for processed plant products, so these must be certified in compliance with Regulation 2018/848.

¹ Recognition of a country's organic control system is currently either:

- through a (often) unilateral equivalency arrangement; the list of recognised countries is indicated in Regulation 2021/2325 (this option will be phased out by the end of 2026), or
- via a bilateral trade agreement on organic products (this will be the only remaining option from 2027).

Note that information provided in this guide is primarily intended for operators that are certified in compliance with the EU Organic Regulation. It does not apply directly to operators that are certified according to national organic legislation recognised by the EU as equivalent, or by trade agreement.

Certification according to the new compliance regime for organic imports

The majority of countries worldwide must now be inspected and certified under the new “compliance” regime of Regulation 2018/848. From 1 January 2022, when the Organic Regulation was first applied in the EU, organic production for export to the EU was still certified under the third country control body recognition system (as under the earlier organic Regulation (EC) 834/2007). This system ended on 31 December 2024, after a 3-year transition period.

The new compliance control system is summarised in Chapter 2 of this guide, and the requirements for farm production, preparation, handling, and export of organic products are explained in Chapters 3 and 4.

National organic control systems recognised by the EU

For 14 countries, under the old regime the EU recognised their national organic legislation and control systems (in whole or in part) as equivalent to the EU Organic Regulation. The list of equivalent countries, their recognised control bodies, and any restrictions or conditions of the recognition is indicated in Regulation [2021/2325](#), Annex I.

As of May 2025, Argentina, Australia, Canada, Costa Rica, India, Israel, Japan, Korea, New Zealand, Tunisia, and USA remain on this list. By the end of 2026 (at the latest)², this country equivalence recognition system will end, and will be replaced by a system of trade agreements covering organic products. At the time of writing, some countries (Chile, Switzerland, UK) have already completed trade agreements, and negotiations are in progress with the other 11 plus two additional countries (Mexico and Colombia).

Organic products that are produced and certified under recognised national organic legislation may be imported into the EU without additional EU organic certification, provided that certain conditions and limitations are met (as indicated in the equivalence recognition – Regulation 2021/2325, Annex I – or the respective trade agreement). The following describes examples of such conditions, and explains why some production from a recognised country may still need to be certified under the compliance regime.

² In December 2025 the European Commission published a working document for a targeted amendment of Regulation 2018/848, including the extension of the transition period for equivalent countries until 2036. The final regulatory changes after discussion in the Council of the EU and the European Parliament are not yet known. Updates will be published on the [AGRINFO](#) website.

Example

Partial recognition of the Tunisian organic legislation

According to Regulation 2021/2325, Annex I, Tunisia's organic control system and its production standards are recognised as equivalent, but only in part (covering only certain product categories, origins, and control bodies). Their recognition covers unprocessed plant products, and processed products (with ingredients of plant origin) for use as food, provided that the products are grown in Tunisia, and processed in Tunisia using ingredients organically grown in Tunisia.

For example, Tunisian organic olives, and Tunisian organic olive oil made from Tunisian olives, may be imported into the EU as organic, provided that the Tunisian organic certificate is issued by a certification body recognised by the EU (for Tunisia).

Livestock products, such as honey and cheese, or processed products that contain organic ingredients from outside Tunisia, are not covered by the recognition. To be imported into the EU as organic, these products and ingredients must be certified according to the EU Organic Regulation under the "compliance" regime.

1.2 Terms and definitions in Regulation 2018/848

Term	Definitions in Regulation 2018/848 (Art. 3), in black <i>Explanations or examples for operators in green</i>
Operator	<p>The natural or legal person responsible for ensuring that this Regulation is complied with at every stage of production, preparation and distribution that is under that person's control</p> <p><i>Includes the farmer, corporate plantation, processor, exporter etc. that is certified. Operators are certified individually. Each operator (e.g. plantation) is controlled and certified annually by an organic control body (see Chapter 2).</i></p>
Group of operators	<p>A "group of operators" is a new concept defined in Art. 36.1 of Regulation 2018/848; see section 2.2 for a more detailed explanation</p> <p><i>In simplified terms, a group can be composed of up to 2,000 members, all of whom are organic/in-conversion farmers (or algae/aquaculture operators), are under the maximum farm size/organic turnover limit (5 ha/€25,000); have a legal personality; and an internal control system and joint marketing system of organic products.</i></p>
Farmer	<p>A natural or legal person, or a group of natural or legal persons, regardless of the legal status of that group and its members under national law, who exercises an agricultural activity</p> <p><i>A farmer can be certified individually or, in the case of a small-scale farmer, as a member of a group of operators (see section 2.2). A farmer cannot be certified as an individual operator and as member of a group for the same product.</i></p>

Term	Definitions in Regulation 2018/848 (Art. 3), in black <i>Explanations or examples for operators in green</i>
Holding	<p>All the production units operated under single management for the purpose of producing live or unprocessed agricultural products, including products originating from aquaculture and beekeeping (...)</p> <p><i>(see full definition in Art. 3 of 2018/848)</i></p> <p><i>Farm holding covering all organic, in-conversion, or non-organic fields (including agricultural land not currently used) and facilities (e.g. storage) managed by the operator (or member in a group of operators) for agricultural production.</i></p>
Production unit	<p>All assets of a holding, such as primary production premises, land parcels, pasturages, open air areas, livestock buildings or parts thereof, hives, fish ponds, containment systems and sites for algae or aquaculture animals, rearing units, shore or seabed concessions, and premises for the storage of crops, of crop products, of algae products, of animal products, of raw materials and of any other relevant inputs managed as described in point (10), point (11) or point (12)</p> <p><i>The combination of all fields, animals, equipment, buildings, products, and substances (from here on called the “technical means”) that are being used for organic, in-conversion, or conventional production. See section 3.2 for more information on organic, in-conversion, and non-organic production units.</i></p>
Preventive measures	<p>Measures that are to be taken by operators at every stage of production, preparation and distribution in order to ensure the preservation of biodiversity and soil quality, measures for the prevention and control of pests and diseases and measures that are to be taken to avoid negative effects on the environment, animal health and plant health</p> <p><i>The combination of measures put in place by farmers to ensure the health of crops, livestock, soil, and the environment. (See section 3.6 on soil management, and 3.7 on disease, pest, and weed management.)</i></p>
Precautionary measures	<p>Measures that are to be taken by operators at every stage of production, preparation, and distribution to avoid contamination with products or substances that are not authorised for use in organic production in accordance with this Regulation, and to avoid the commingling of organic products with non-organic products</p> <p><i>Proactive measures that must be taken to avoid the contamination of organic produce (see section 3.9).</i></p>
Plant reproductive material (PRM)	<p>Plants and all parts of plants, including seeds, at any stage of growth that are capable of, and intended for, producing entire plants</p> <p><i>Includes seeds, grafting material, seedlings, and all other vegetative reproductive material (e.g. seed potatoes) that may be used for producing plants.</i></p>

2. APPLYING FOR, OBTAINING, AND MAINTAINING CERTIFICATION

The main EU Organic Regulation [2018/848](#), and several items of secondary regulation (e.g. Regulations [2021/771](#) and [2021/279](#)), describe the controls to be applied by control bodies and competent authorities within the EU.

Regulation [2021/1698](#) mirrors these EU control requirements by describing the controls (inspection and certification) to be carried out in non-EU countries. These must be conducted by control bodies that are officially recognised (approved) by the EU to conduct inspections and certification in each country.

Here we give a simplified description of the control system in countries outside the EU for organic producers, processors, and exporters under the compliance regime. This system applies in all non-EU countries, except the 14 countries with national organic systems recognised by the EU (see section 1.1).

More detailed information on the organic inspection and certification process can be obtained from the organic control bodies recognised (approved) by the EU to implement these controls in each country.

2.1 The organic inspection and certification process (compliance regime for imports)

§	<p>Key references in Regulation 2021/1698, Part III³</p> <p>Art. 9: General provisions for the control of operators or groups of operators</p> <p>Art. 10: Checks for the certification of operators or groups of operators</p> <p>Art. 11: Methods and techniques for controls</p> <p>Art. 12: Sampling, methods used for sampling, and selection of laboratories for sample analysis</p> <p>Art. 13: Documented control procedures</p> <p>Art. 14: Written records of controls</p> <p>Art. 16: Verification of consignments intended for import into the European Union</p> <p>Regulation 2021/2119, Art. 2: Records to be kept by operators and groups of operators</p>
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2.1.1 Basic control requirements for exporting organic products to the EU

The term “organic” is legally protected in the European Union and can only be used to label products that are produced, labelled, and certified according to the EU Organic Regulation 2018/848.

All operators involved in the supply chain, up to the point of import into the EU, must have a conformity certificate for operators or groups of operators (commonly referred to as an “operator certificate”).

All products intended to be imported into the EU as organic must be accompanied by a “Certificate of Inspection” (COI), which is verified by the EU customs authorities when the products are presented as organic at EU border controls.

The COI for each import consignment must be issued by an EU-recognised control body (CB) that has inspected and certified the exporter (which may or may not also be the producer and/or processor). The COI is issued electronically in the EU TRACES platform.

³ “Controls in respect of operators and groups of operators by the control authorities and control bodies”.

The COI confirms that the products have been controlled in compliance with the EU Organic Regulation at all stages. It also confirms that all operators involved in the supply chain of a given product are certified in accordance with Regulation 2018/848.

There are special rules for the control of subcontracted activities (under Regulation 2021/1698, Art. 10.2). Control bodies determine how subcontracted activities should be controlled, according to who is responsible for the organic production at each stage.

To illustrate, examples of different scenarios are given below.

Example 1

One entity produces, processes, and exports the organic product

If one operator is the producer, processor, and exporter of an organic product (e.g. a coffee plantation that also processes and exports the coffee directly), they are usually controlled and certified under one operator certificate. A farmers' organisation, e.g. an organic coffee farmers' cooperative that processes and exports organic coffee to the EU, can also be certified under one operator certificate as a group of operators (see section 2.2) for all its organic activities (production, preparation, storage, and export).

Based on the operator certificate (and any additional documentation relevant to each shipment), the CB issues an electronic COI for all shipments to the EU before the products leave the exporting country.

Example 2

Different entities involved in production, preparation/processing, and export

If, in addition to the exporter, other supply chain actors are also involved in the production and/or preparation/processing of an exported product, the CB must verify that all these actors are controlled and certified (in compliance with Regulation 2018/848).

For example, a processor and exporter of organic dried fruits in Africa may be certified as the operator for preparation, storage, distribution, and export. All the organic producers or producer groups supplying the fruit to the company, and any other supply chain actors involved, must also be certified separately. This could include, for example a mango farmers' association and a pineapple cooperative that are certified as groups of operators, as well as a certified banana plantation. A processing company that is freeze-drying fruit on behalf of the exporter could be controlled as a subcontractor, or could hold its own operator certificate (to provide services to various organic customers).

The CB of the exporter issues the electronic COI for all export consignments. This is based on the verification of any additional documentation for each consignment, including information on the producers and all other actors involved in the handling of the organic products. Control bodies may require additional documentation (e.g. a domestic organic transaction certificate) if the producer is certified by another CB.

Special requirements for “high-risk products” from countries outside the EU

For certain combinations of products and non-EU countries of origin, the European Commission establishes a list of high-risk products from third countries⁴ (Regulation 2021/1698, Art. 8). For products designated as high risk, CBs in the exporting country, as well as in the importing country in the EU, must apply additional special control measures (e.g. two annual inspections in the exporting “high-risk country”). They must also check and take residue samples in the exporting country from a specified percentage of consignments to the EU (e.g. 5% of export consignments for bananas in some countries).

2.1.2 Applying for certification

Any operator or group of operators involved in the production of organic products for the EU market must be certified by a control body (CB) that is officially recognised (approved) by the EU to conduct certification in compliance with Regulation 2018/848. The list of recognised CBs is published in Annex II of Regulation [2021/1378⁵](#), indicating for which countries and product categories each CB is recognised.

For plant products exported from countries outside the EU, the following product categories in Annex II are the most relevant:

- (A) unprocessed plants and plant products, including seeds and other plant reproductive material
- (D) processed agricultural products, including aquaculture products, for use as food⁶.

When selecting a CB, operators should consider local availability of their staff and costs, as well as reputation, and local service options. Many organic CBs have national staff and offices, but may take the certification decision in a regional office or the head office in Europe or the USA. National organic authorities or organic movements may be able to help and advise operators on the process.

An operator or group of operators cannot be certified by more than one CB for the same product category (e.g. unprocessed plant products). Different legal entities in the supply chain may be certified by different CBs, although this may complicate the export process as the exporter’s CB may require national transaction certificates in order to issue the COI.

Control bodies will provide information about their procedures to explain the certification process, and will ask applicants to complete a number of documents. The CB must verify various points (required by Regulation 2021/1698, Art. 10) before agreeing to certify an operator or group of operators, in particular:

- description of the production units and the activities for organic production
- description of measures that allow the auditor to evaluate whether the operator can comply with the production rules, including precautionary measures
- signature of a certification contract (with the various commitments of the applicant included).

⁴ Regulation 2021/1698 (Art. 8): High-risk products and the third countries in which they originate must be listed together with the shares of consignments of those products to be subject to additional physical checks and sampling. The list of high-risk products will be published under secondary legislation in due course. For the time being, the list is published as an annual letter sent by the European Commission to recognised control bodies in non-EU countries, and in a supplementary working document, both available via the Commission webpage [Trade in organics](#).

⁵ Always follow this link and then click on “Current consolidated version” to see the latest version, as the list is updated frequently.

⁶ The EU has a specific definition of what constitutes a processed product. Whether an imported product is “processed” or “unprocessed” is determined by the CB, based on general EU law and guidance.

In the case of an operator that is not already organic certified, the date when the first application for organic certification is made to the CB is important: this is registered as the date of “notifying organic activities” to the CB, and usually constitutes the start of the conversion period (see section 3.3 for details).

2.1.3 Keeping documentation

Operators and groups must keep two kinds of documentation for organic certification.

- **Documentation and procedures to ensure compliance**

Documentation describing the production facilities, processes, and operational procedures is used as a baseline for the CB to organise the inspection, and is important for an efficient control process.

Examples: List of production facilities; procedure for selecting and monitoring organic suppliers; procedures for reception of incoming goods and storage of organic products; description of precautionary measures; internal control system (ICS) procedures (in the case of a group of operators).

- **Documentation to demonstrate that all requirements have been complied with**

Examples: Records on preventive measures; application of pest control products and fertilisers; harvest; processing and storage; traceability. Also, internal inspection reports and training records (in the case of groups of operators).

Compulsory procedures and records are described in section 2.2 (Specific requirements for the certification of “groups of operators”); Chapter 3 (On-farm requirements for organic production); and Chapter 4 (Requirements for the preparation, handling, and marketing of organic products).

2.1.4 On-site inspection and follow-up

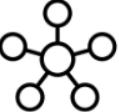
Each operator and group of operators is subject to at least one on-site inspection every (calendar) year. Before carrying out the on-site inspection, the certification body will review the documentation provided.

During the on-site inspection, the inspector will check whether the actual situation corresponds with the documentation submitted and meets organic requirements. They will also check if preventive and precautionary measures have been applied (e.g. measures to prevent contamination or mixing of organic products). To verify and cross-check the information, the inspector visits fields, other production facilities, and storage rooms; interviews the farm manager and possibly workers; and reviews records.

In the event that the use of non-permitted inputs is suspected, and/or based on the CB’s annual sampling plan, the inspector will take samples for laboratory testing. Inspectors must also carry out a mass balance check, and a traceability check. Operators must make available the necessary traceability and financial records (e.g. invoices) for checks during the inspection.

At the end of the on-site inspection, the inspector will discuss their findings, and a report on the inspection will be signed (by the operator and inspector) and left with the operator. In the event that non-conformities have been identified, these will be documented in the report, together with an overview of the corrective actions that must be implemented by the operator (with deadlines).

Corrective actions may include sending missing documentation, or making other short-term corrections that the inspector can consider and include in the final inspection report sent to the certification office. If there is suspicion of a more serious non-compliance that could affect the integrity of the organic product, the inspector may impose immediate sanctions such as suspension of certification (no sales as organic) until the issue has been investigated further.

	<p>Group of operators: Aspects of the certification inspection that are specific groups of operators</p> <ul style="list-style-type: none">• Verification of the functioning of the internal control system (ICS)• Re-inspection of at least 5% of members to evaluate the quality of the ICS; the inspector must also witness at least one internal inspection• At least 2% of members are subject to sampling• Inspection of purchase centres, and the traceability system from members to sales <p>See section 2.2 for more information on the certification of groups of operators.</p>
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2.1.5 Certification decision

The control body (CB) will review the results of the on-site inspection and take a decision on certification, based on the CB's recognised procedures and catalogue of measures (catalogue of sanctions). The decision is always taken by someone other than the person who carried out the inspection.

If the organic certificate can be issued, the CB will issue it in the TRACES system using the new standardised format set by Regulation 2021/1378, Annex I. Control bodies may also send a notification letter to the operator or group of operators with further details on the certified products and areas, a final list of required corrective measures, and usually also the final official version of the inspection report.

The first certification is particularly important, as products can only be marketed as organic or organic in-conversion from the first certification onwards (subject to meeting the conversion rules, as explained in sections 3.2 and 3.3).

2.1.6 Continued surveillance and measures in the event of suspected non-compliance

Each (calendar) year, to continue exporting products as "organic" into the EU, the operator or group of operators must be inspected and certified to confirm their compliance with organic rules. If they no longer meet the requirements for organic certification, their certification will be suspended or withdrawn.

Additional unannounced inspections and sampling

The CBs must carry out a **risk assessment** of their certified operators and groups of operators, and on the basis of this, they conduct additional inspections (at least 10%). At least 10% of all on-site inspections are unannounced.

Also, the CB is required to carry out **sampling** on at least 5% of the individual operators that it certifies. For a group of operators, the CB must carry out sampling on at least 2% of the members of each group.

Higher control and sampling requirements for high-risk countries

The EU publishes a list of “high-risk organic and in-conversion products originating from third countries” (Regulation 2021/1698, Art. 8; see section 2.1.1 of this guide). Operators involved in the production or marketing of “high-risk products” will have two inspections (and at least one field sample) per year. In addition, the CB will check and take residue samples from a specified percentage of consignments (e.g. 5% of export consignments of bananas).

Notification of changes

During the year, certified operators or groups of operators must notify the CB of significant changes (e.g. if members of a group of operators are suspended or excluded). Also, any suspected non-compliance or use of unauthorised substances must be notified to the CB (in line with Regulation 2018/848, Arts. 27 and 28, and the procedural steps indicated in Regulation 2021/279, Art. 1).

Procedures following detection of unauthorised substances

If the CB detects unauthorised products or substances in an organic or in-conversion product, or receives substantiated information about their presence, it must carry out an official investigation and provisionally prohibit the marketing of the affected products as organic (in line with Regulation 2018/848, Art. 29, and additional details in Regulation 2021/279; see also section 4.7 of this guide).

2.2 Specific requirements for the certification of “groups of operators”

2.2.1 Basic requirements for the group (in addition to the internal control system)

§	Key references in Regulation 2018/848 Art. 36: 1 [Definition of a group of operators] Regulation 2021/279, Art. 4: Composition and dimension of a group of operators European Commission: Frequently asked questions on organic rules , Section 3, Questions 8–13
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Regulation 2018/848 gives a specific definition of a “group of operators” (Art. 36.1). Only a group that meets all the elements of this definition can be certified as a group of operators.

In June 2023, the European Commission clarified several key questions concerning groups of operators in its document [Frequently asked questions on organic rules](#) (see part 3, questions 8 to 13). The answers specify that a group of operators cannot have non-organic statutory members or members that do not fulfil all the criteria of Art. 36.1. They also clarify the requirement of “legal personality”, and processing activities in a group of operators. In December 2025, the EU published a working document for a targeted amendment of Regulation 2018/848, including changes to the definition of a group of operators⁷.

⁷ The [Commission staff working document](#) published on 16 December 2025 proposes a few targeted amendments of Regulation 2018/848. It is proposed to change the size limit for members in a group of operators to 10 ha, and to simplify the composition rules for farmers’ organisations. The final regulatory changes after discussion in the Council of the EU and the European Parliament, and the timeline for any agreed changes, are not yet known. Updates will be published on the [AGRINFO](#) website.

New definition of a group of operators

This explanation summarises the requirements in Art. 36.1 combined with the clarifications in the FAQ document in a simplified way.

- The group of operators must be **composed only of organic or in-conversion farmers**.
- There are strict **limits on the size of each group member**, assessed either by their holding size or the turnover associated with their organic sales through the group:
 - Each member in a group *either* must have a total holding size that is not more than 5 hectares, 0.5 hectares in the case of greenhouses, or 15 hectares in the case of permanent grassland, *or* must have an annual turnover of organic production of not more than €25,000.
 - Regulation 2018/848 includes an additional criterion concerning the certification cost as a proportion of each member's turnover. However, in all countries where the cost of individual certification is more than €500, this is not relevant, so in effect the maximum total organic turnover of €25,000 is the applicable limit (as €500 corresponds to 2% of €25,000).
- A farmer can only be a member of **one group for a given product** (though they may be in another group for the supply of a different product).
- A **processing/export company cannot be certified as a group of operators** (unless it is composed of farmers that all meet the size criteria).
- A group of operators can have **no more than 2,000 members**.
- A group of operators must have "**legal personality**".
 - This means that it must be recognised under national law as having a distinct identity, as well as legal rights and duties (e.g. it can own property, enter into contracts, etc.).
 - In a given country, the national laws generally allow for different types of legal entity, not restricted to farmers' cooperatives or associations. It is important for new entities to research what is possible under national law, to ensure that they choose a legal personality that is most appropriate for their long-term operations and financial sustainability.
 - A group of operators can be a member of another organisation, and can have contractual and cooperative obligations towards another entity.
- The group of operators must operate a **joint marketing system** for the organic products. This means that there must be a traceability system in place from members to their sales by the group. It also means that only their sales through the group are covered under the organic certification; any individual sales by members (e.g. on the local market) are not covered.
- The group must operate an **internal control system** (see section 2.2.3). A group without an ICS, but with 100% control by the certification body, cannot be certified as group of operators.
- The group's members must be in **geographical proximity** (at least in the same country).
- A group of operators can perform a number of activities, including "**preparation**" and "**processing**" under the group's certification, after collecting the organic products from its members. Individual members may also undertake preparation and processing before delivering products to the group.

Figure 1 gives a simplified illustration of the new rules for groups of operators.

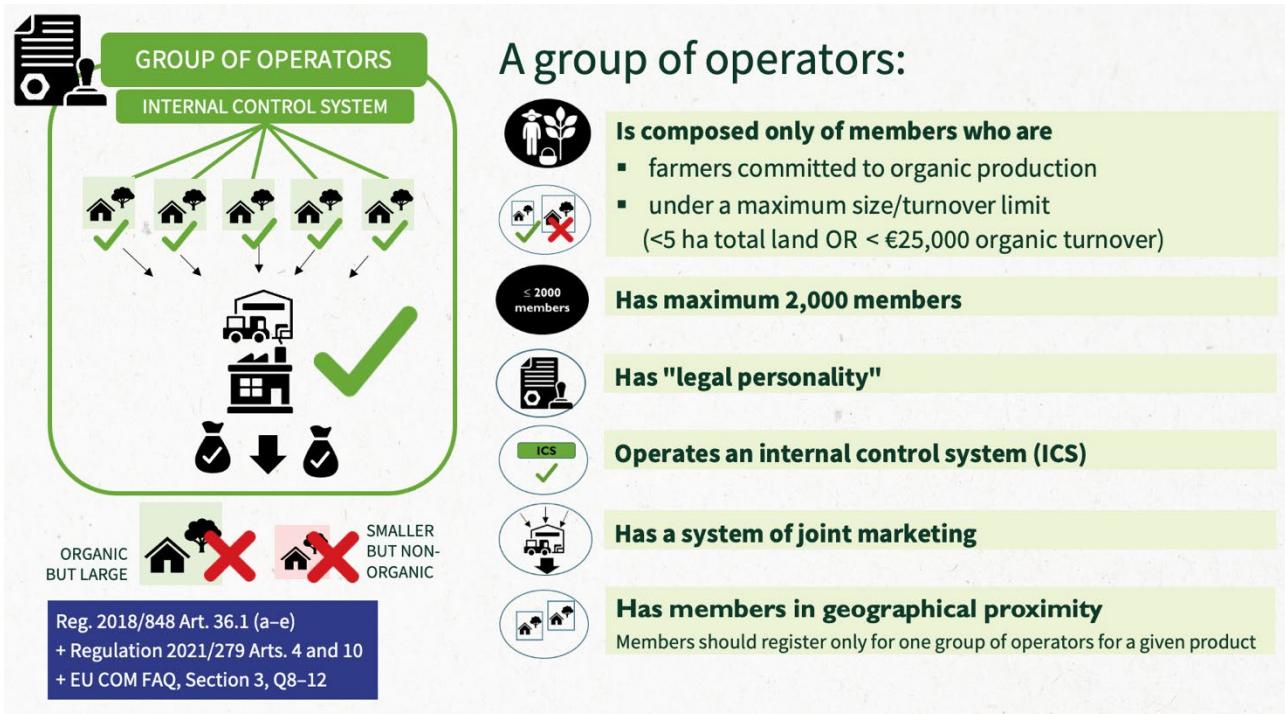


Figure 1: Definition of a group of operators (Art. 36.1)

Source: developed for training purposes by FiBL and COLEAD.

Options for existing producer groups that do not meet the new definition of “group of operators”

In summary, the new EU Regulation only allows for certification of farms either as individual “operators” or as “groups of operators”. Groups of operators must comply with *all* elements of the definition under the new rules. Other forms of producer groups that were accepted under the previous equivalence regime can no longer be certified on the same basis.

In practice, farmers’ organisations that have over 2,000 members, or have some members that do not meet the criteria (e.g. members above the size limit), will have to adapt. Similarly, other types of producer groups (e.g. a processor with contracted farmers under group certification) that do not fully meet the new definition cannot be certified as a group of operators, and will also need to adapt.

There is no universal solution in this situation, and every organisation will need to carefully consider its options. Groups are strongly advised to discuss the potential solutions with their CB. They need to take into account the most appropriate legal entity for them under national law, as well as the viability and functioning of their operations under a revised composition.

Taking time to consider the options is also important. Organisations tend to think first of just changing their composition (e.g. by splitting into two, or by excluding non-organic members or those who are “too big”), but there may be better solutions.

For farmers’ organisations, the adaptation options vary depending on the type of organisation. Farmers’ organisations that are composed of individual farmers as their members are called “first-grade farmers”

organisations" (e.g. cooperative societies, farmers' associations). However, many farmers' organisations are second-grade (or even third-grade) organisations, which are composed of farmers' organisations as members.

Example

A regional coffee union in East Africa (second-grade organisation) is composed of 15 village-level cooperative societies (first-grade organisations in which the members are farmers). The farmers sell the coffee to their local cooperative, which then supplies the products to the union for joint processing and export.

An important option for second-grade farmers' organisations is to certify selected fully organic first-grade organisations as groups of operators. The certified second-grade organisation (in the above example, the coffee union) can be certified separately as an operator for preparation and export⁸, while at the same time exporting the groups of operators' organic products to Europe. It can also be subcontracted by the new group of operator entities for certain services (ICS, traceability system, etc.) to provide operational continuity.

Example

The coffee union selects eight of its 15 first-grade cooperatives as groups of operators, selecting those that best meet the new rules for the European organic market. The coffee union continues to provide ICS services to the cooperatives (via the appointment of the union's ICS manager and inspectors). Under the old system, the coffee union held one organic certificate. Under the new system, there will be one EU-organic operator certificate for the union, and eight group of operators' certificates.

For first-grade organic farmers' organisations that do not meet the new membership rules, adaptation is particularly challenging. In the case of an all-organic farmers' organisation with only a few members that are "too big", an adaptation option could be that these larger farms are split into units smaller than 5 ha (or under €25,000 organic turnover). Alternatively, several larger neighbouring farms could join operations to become certified as one individual farm operator.

Changes must also be made by processor/exporter companies that previously worked with contracted farmers under their organic certificate. A common approach in this situation is for the farmers to set up one or more groups of operators for production (often facilitated by the trading company), while the processor/export company is then certified separately as an operator for preparation/processing and export. In this scenario, the company could still provide support and services to the groups, including for management of their ICS.

2.2.2 Rules for members of a group

The members of a group of operators (organic or in-conversion) must comply with the same organic production rules as individually certified operators (see Chapter 3). This includes their farming operations including post-harvest preparation and storage, up to the point when the organic products enter the group's

⁸ This means the farmers' organisation is inspected and certified as an "operator" (in the same way as a processing/export company), so in box 2 of the operator certificate, the box "operator" is ticked, not "group of operators".

joint marketing system. The group internal control system (ICS) can support its members in keeping the necessary farming records.

All members of a group of operators must sign a membership agreement that covers all the minimal requirements specified in the Regulation (Art. 36.1(g)). This includes:

- complying with the Regulation
- participating in the ICS and complying with ICS procedures
- permitting access to all premises
- accepting and implementing measures in the event of non-compliances
- immediately informing the ICS manager about suspected non-compliances.

A member of a group of operators must confirm (e.g. in the membership agreement) that they have not been certified for the same activity and product/s on an individual basis (as a farm operator) (Regulation 2021/1698, Art. 10.1). They can only register with one group of operators for a given product (Regulation 2021/279, Art. 4).

Example

A coffee and mango farmer can only be a member in one group of operators for their coffee production and on-farm processing, but could join a mango group of operators for the marketing of their mangoes.

2.2.3 Rules concerning the group's internal control system

§	Key references in Regulation 2018/848 Art. 36.1 (g): [ICS Activities and Procedures] Art. 36.1 (h): [ICS Manager and ICS Inspectors] Regulation 2021/279, Art. 5: Documents and records of a group of operators
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Each group of operators must establish and implement an internal control system (ICS). The requirements for the ICS are outlined in Art. 36.1 of Regulation 2018/848 covering, among others, procedures of the ICS (g), and responsibilities of the ICS manager and inspectors (h). Regulation 2021/279, Art. 5 provides further important details on compulsory ICS documents and records.

In summary, the ICS of a group of operators must meet the following requirements.

- **ICS procedures:** The ICS must have documented procedures for the group on (as a minimum):
 - registration of members, and approval of new members or activities by the ICS manager
 - conducting the internal inspection
 - measures to be taken in the event of non-compliances
 - internal traceability of organic products, from members to sales
 - training of ICS inspectors and members
 - control of documents and procedures.
- During the external inspection, it will be verified that these procedures meet the legal requirements and that they are effectively implemented in practice.
- **ICS manager and ICS inspectors:** The group of operators must appoint one ICS manager, who has overall responsibility for the operation and functioning of the ICS (and is responsible for all duties outlined in Art. 36.1(h)). The group must also appoint an adequate number of ICS inspectors (at least one in addition to the ICS manager) and ensure that they are free from conflicts of interest. The group may also appoint more ICS staff to help meet all the requirements (e.g. field advisors to visit and train farmers; purchase officers; office staff), but this is not obligatory.
- **Members list and data; ICS records for each farmer:** Up-to-date data must be available from all members in the members list, for presentation to the CB. This includes current yield estimates and details for all organic as well as in-conversion and non-organic land operated by the member (see required details in Regulation 2021/279, Art. 5). These data can be collected during internal inspections, but are often documented in additional ICS records (electronic or paper), such as farm data sheets, and yield estimates from field advisors shortly before harvest. It is very important that the members list is kept up to date with data that accurately reflects the situation on-farm, and the findings of internal inspections. The ICS records must also include a signed membership agreement for each farmer (see obligations of the farmer in section 2.2.2).
- **100% inspection of all members:** The group must ensure that *all* members have an internal inspection at least once a year. This must include a visit of fields and other production or storage facilities, and an interview with the farmer, and must be documented in an inspection report. The internal inspection covers all relevant aspects of organic production (production, storage, preparation, and processing activities, as appropriate) to ensure that members comply with all applicable EU organic production rules. The organic production rules, including tips for implementation in a group ICS, are explained in Chapter 3 of this guide.
- **Measures in the event of non-conformities:** If the ICS detects non-conformities with the EU production rules, the ICS manager must decide on appropriate corrective actions and/or sanction measures. They must also ensure that these non-conformities and measures are followed up and documented in the ICS records, and that the farmers' list is updated as necessary. In the event of major non-conformities (that may affect the organic integrity of products), the ICS manager must inform the CB and ensure that products from the affected operator are kept separate until their organic certification status is clarified.
- **Collection and traceability system:** The group must have a collection or purchase system that enables the organic status and products delivered from each farm to be checked against yield estimates, and all purchases to be duly recorded. There must also be a traceability system that ensures products from each member are traceable until they are sold by the group, and are not contaminated or mixed

with non-organic products. The group's traceability and product handling system must also comply with all applicable organic rules for collection, storage, preparation, and export of organic products, as explained in Chapter 4 of this guide. A group of operators may subcontract their traceability and collection system to another entity (e.g. the organic processor/exporter who the group delivers to, or a "parent" organic farmers' organisation).

Setting up a new operator group certification and new ICS may require time and external support. The following resources are useful for a deeper dive into implementation of the new IC rules.



The [FiBL training handbook on the new EU Regulation for producer groups](#) (module 2 on organic production rules, and module 3 on ICS requirements) is designed for ICS managers. It gives more details on the new rules, with best practice tips to establish an ICS and train ICS staff.

The [Naturland ICS Manual](#) is another useful resource on all aspects of a well-functioning ICS, updated in accordance with the new EU requirements for groups of operators.

Adapting an existing internal control system to the new rules

The new ICS requirements under Regulation 2018/848 are still in line with the ICS best practice that has been promoted by IFOAM since the early 2000s. As a result, all producer groups certified to an organic regulation in the past will have some form of ICS.

ICS procedures are commonly compiled into a group ICS manual, which may also cover requirements of other standards with which the group is certified [e.g. National Organic Program (NOP) for the US market; national organic regulations; and/or private organic standards such as Bio Suisse and Naturland].

An existing ICS must be updated and aligned to comply with the new ICS requirements under Regulation 2018/848. It must also ensure that all members meet the applicable membership and organic production rules.

Where groups have reorganised to meet the new group of operator rules, each group of operators must establish and implement its own ICS. However, it can assign an ICS manager and ICS inspectors from outside the organisation, for example from the export company that they supply, which may have managed their ICS under their previous certification (under the old equivalence rules).

Groups may find that as they align with the new requirements, their ICS and documentation may need to be strengthened and enhanced to ensure that all members and the group's central activities comply with the new production rules.

The following checklists provide ICS managers with an overview of the new ICS requirements. They follow the structure of many existing ICS manuals for self-assessment, to help support adaptation to the new rules.

Self-assessment checklist: Organisation of the ICS and ICS staff	
ICS procedures	ICS records
ICS manager is assigned all responsibilities as outlined in Art. 36.1(h)	Annual training records of ICS inspectors (and assessment of competency by ICS manager)
Sufficient number of competent ICS inspectors	Annual conflict of interest statement of ICS inspectors
Procedure for training ICS inspectors	Appointment of ICS manager and ICS inspectors
Procedure on control of documents and records	(<i>may be external / not necessarily staff of the group of operators</i>)

Self-assessment checklist: Registration of members, internal inspection, measures in the event of non-compliances	
ICS procedures	ICS records
<p>Written ICS procedures for registration and approval of new members and/or activities/fields</p> <p>Membership agreement contains all necessary new details (see section 2.2.2).</p> <p>Written ICS procedure for internal inspection of members; inspection schedule by ICS manager.</p> <p>100% internal inspection of all members and purchase centres is implemented every year</p> <p>Internal inspection includes farmer interview, visit to fields and storage (including non-organic units), and checks of all relevant new production rules</p> <p>Procedure to estimate yields and keep member/farm data up to date (in the member list)</p> <p>ICS procedure on training of members</p>	<p>Signed membership agreements for all members</p> <p>Internal inspection reports for all members with compulsory details (see Regulation 2021/279, Art. 5)</p> <p>Records on measures taken in the event of non-compliance (including notification to CB and updating of members list to reflect the measures)</p> <p>Complete and up-to-date members list (compulsory elements in Regulation 2021/279, Art. 5)</p> <p>Records on training of members</p> <p><i>Farmers' records (often kept with help of ICS): including records on production, inputs, preventive and precautionary measures (see details in Chapter 3)</i></p>

Self-assessment checklist: Joint marketing and traceability system	
ICS procedures	ICS records
Procedure on internal traceability, including procedure for reception of products from members (with check of yield estimate), purchase, labelling, and separation (see Chapter 4)	<p>Traceability records (documented reception of check, lot number system, storage records, transport records, sales records) as necessary for traceability checks and mass balance checks</p> <p>Records for internal inspection of purchase centres</p>

2.2.4 Inspection and certification of groups of operators

§	<p>Key references in Regulation 2018/848</p> <p>Art. 36.2: (ICS Deficiencies)</p> <p>Regulation 2021/1698: Art. 9.7 (re-inspection in a group of operators), Art. 9.9 (control of collection or purchase centres), Art. 12.2 (sampling)</p> <p>Regulation 2021/771, Art. 2: Official controls of groups of operators (via Regulation 2021/1698, Art. 9.8)</p>
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The inspection and certification of groups of operators have some particularities compared to the standard inspection and certification processes described in section 2.1.

In particular, the on-site inspection of a group of operators focuses primarily on verifying the functioning of the ICS procedures and records, as follows.

- Verification that the required ICS procedures and records are in place and up to date.
- Re-inspection of at least 5% of members (full farm inspection) to evaluate the quality of the ICS. The inspector must also witness at least one internal inspection.
- Verification of farm data, in particular to check coherence between field realities and the list of members, and other ICS records such as internal inspection reports, maps, and yield estimates.
- Evaluation of measures taken by the ICS to address any non-conformities identified during internal inspections.
- At least 2% of members are subject to sampling for residue testing.
- Inspection of purchase centres, and the traceability system from members to sales.

If deficiencies in the setup or functioning of the ICS are identified that affect the integrity of the organic system (in particular, if the ICS fails to detect or address non-compliances by individual members), certification for the *entire group* must be withdrawn. In evaluating deficiencies (as listed in Art. 36.2 of Regulation 2018/848), the certification body should consider the number of non-compliances undetected by the ICS, and the results of any investigation into the cause and nature of the non-compliances.

3. ON-FARM REQUIREMENTS FOR ORGANIC PRODUCTION

3.1 Principles of organic production and prohibited practices

§	Key references in Regulation 2018/848 Art. 5: General principles for organic production as a sustainable management system Art. 6: Specific principles applicable to agricultural activities and aquaculture Annex II, Part I: Plant production rules (various specific sections prohibiting certain practices)
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Organic products are the result of a production process and principles based on the following aspects.

- Maintain and improve the health of the soil, water, and air, and promote biodiversity.
- Respect natural systems and cycles. Use natural resources and energy responsibly to establish closed cycles.
- Maintain and enhance soil fertility and biological activity.
- Ensure a high standard of animal welfare for any animals on the (plant production) farm, including natural living conditions and access to outdoor areas.
- Prevent diseases and pests primarily through natural methods, such as choosing appropriate breeds and varieties, or using natural enemies, rather than treating problems chemically.
- Produce high-quality agricultural products (including processed foods).
- Ensure systematic identification and separation between organic and conventional products, including the products and inputs used to produce them.
- Apply precautionary measures to prevent the contamination of organic products.

Practices prohibited in organic production

Organic crops (except those that are naturally grown in water) must be produced in living soil, or in living soil mixed or fertilised with materials and products allowed in organic production, that is **in connection with the subsoil and bedrock**. Hydroponics, or the production of plants in containers (other than seedlings, transplants, or some specified plants such as herbs) is not allowed.

The following practices are also prohibited.

- The use of genetically modified organisms (GMOs) or products derived from them (see section 3.4 for more information).
- The use of plant reproductive material that has been treated with products not authorised for use in organic production, and the use of non-organic seedlings (section 3.5).
- Application of mineral nitrogen fertilisers (e.g. NPK) or fertilisers or soil amendments that are not explicitly authorised for organic production, or do not respect restrictions of use (section 3.6).
- Use of chemical pesticides, fungicides, or herbicides, or any products or substances not authorised for use in organic production (section 3.7).
- Production techniques that contribute to the contamination of the environment (pollution).

Practices prohibited in the preparation and/or processing of organic products

- Irradiation of organic products.
- Mixing organic with non-organic or in-conversion products (either as finished products or as ingredients).
- Use of additives and/or processing aids that are not listed, or not respecting the conditions of use for listed products (e.g. maximum amounts).
- Correcting the result of negligence in the processing of organic products, or during storage, by the use of certain products, substances, or techniques.
- Certain practices in the production of organic wine (see Regulation 2018/848, Annex II, Part VI).

3.2 Organic, conversion, and non-organic production units

§	<p>Key references in Regulation 2018/848</p> <p>Art. 3: definitions of a “holding”, “production unit”, “organic production unit”, “in-conversion production unit”, and “non-organic production unit” – see section 1.2 of this guide</p> <p>Art. 9: General production rules: (2) [Management of the holding]; (7) [Separation into production units]; (8) [Temporary derogation for parallel production of the same crop]; [10) [Separation of the units]</p>
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*Please note that the EU’s definition of a “holding” may be different from how the term is used in other countries. “Holding” refers to **all** agricultural fields (including agricultural land not currently used) as well as facilities (e.g. storage) managed by an operator, or member of a group of operators, for the purpose of agricultural production. It also includes fields that are used for conventional production, or for production that is not for export to Europe as organic.*

In principle, the EU Organic Regulation requires that the entire holding of an operator is managed in compliance with the organic production rules. This is the ideal and lowest-risk situation for organic production. However, if the entire holding cannot be managed in compliance with EU organic rules, the Regulation allows the holding to be split into production units that are effectively separated. In this situation, the rules are as follows.

Organic production unit. This is composed of all the fields that have completed the conversion period and are managed in compliance with EU organic rules. Here:

- organic production and input rules apply to all crops in these fields (including intercrops, cover crops, etc.)
- only inputs authorised for use in organic farming are used, and they are stored separately from non-authorised inputs; the facilities for their storage are part of the organic unit
- all products may be labelled as “organic”, and must be kept strictly separated from products coming from the fields and post-harvest areas where non-organic products are handled.

In-conversion production unit. This is composed of all the fields that are undergoing conversion. These are managed in compliance with EU organic requirements, but their harvest cannot yet be sold as “organic” in the EU. This unit also includes the locations where the harvest from these fields is handled. It may include land parcels or other assets where the conversion period has started at different times. Here:

- organic production and input rules apply for all crops (including intercrops, cover crops, etc.)
- products from this unit may not (yet) be labelled as “organic”, but under certain conditions (see below) they can be labelled as “organic-in-conversion”.

Non-organic production unit. This is composed of fields and other agricultural areas that are not managed as organic. Here:

- any inputs (e.g. chemical fertilisers, crop protection products) used in this production unit cannot be used in the organic or in-conversion units; however, inputs authorised for organic production can be used on the non-organic fields
- products from this unit are non-organic and cannot have any reference to organic production.

The new EU Organic Regulation defines the concept of production units in more detail than previously. In non-EU countries, especially in the case of small farmers certified as members of groups of operators, the concept was not applied as systematically as in Europe. This may mean that changes are needed, for example with regard to the separation of inputs and product storage. Some additional fields may also need to be registered in certification documents or members lists, such as fields used to grow crops for home consumption, or local sales using no-input farming, or fallow. These were previously only considered in the context of being potential contamination risks for the organic crops.

3.2.1 The organic production unit

The organic unit of a farm that is certified for crop production and post-harvest handling consists not only of all the organic fields, but also the facilities used for the storage of inputs used in the organic unit, storage of the organic products, and any additional production facilities such as drying areas (where applicable). All crops in the organic production unit and on the organic fields must be managed according to the EU organic production rules. This includes any crops for home consumption or local sales that are grown on the organic plots as intercrops, cover crops, or green manures.

If the farm has not only an organic unit, but also in-conversion or non-organic units, it is important to establish procedures that avoid the mixing or contamination of organic certified with non-organic fields and produce. The farmer or ICS manager responsible must be able to clearly identify to which of these production units each field (and its harvest) belongs. See more information on mixed production and parallel production in section 3.2.3.



Group of operators: The organic units of members and certified products

Where farms are certified as members of a group of operators, the group's joint marketing system may be restricted to only certain crops that are bought from members for organic exports to Europe (e.g. coffee or cacao), not including all crops grown by the farmer in the organic unit. In this scenario, **the organic production rules still apply to all crops in the organic unit**.

On request to the CB, all crops in the organic unit can be included in the organic certificate of the group of operators, but only if the group:

- starts to maintain detailed yield estimates for these "other crops", and
- markets the products through its joint marketing and traceability system (even for national and other organic sales).

This involves additional time and resources.

3.2.2 The in-conversion unit and labelling of products during conversion

In the in-conversion unit, the permitted labelling of products changes during the conversion period (see also section 3.3).

- **First year of conversion (C1):** Labelling of products harvested from fields in their first year of conversion cannot make a reference to organic production. These are considered to be non-organic products.
- **Second year of conversion (C2):** Products from annual and perennial crops harvested from fields in their second year of conversion can be labelled as "in-conversion".
- **Third year of conversion (C3):** Perennial crops harvested from fields in their third year of conversion can be labelled as "in-conversion". Annual crops can be labelled as organic if they have been sown at least 24 months after the start of the conversion period.

Once the conversion period has been completed, the respective fields leave the "in-conversion production unit" and enter the "organic production unit". This means that farmers need to manage the dynamics of the "in-conversion production unit" carefully to avoid mixing of produce. Management can be simplified if the products grown on the in-conversion fields are not marketed as organic-in-conversion, but they may still require separation measures (notably in situations where the same varieties are grown and marketed as organic).

In countries outside the EU, the conversion status of each field, and the corresponding labelling for any produce marketed, is normally notified by the CB, with a letter to confirm the certification decision. In the case of groups of operators, the members list prepared by the ICS is confirmed by the CB, and must indicate for each farmer the certification status of all products that are collected into the group's joint marketing system. This takes into account the start date of the conversion period of each field of each farmer.

Managing the dynamics of different conversion start dates for different fields requires particular attention. For new farms, the conversion status of fields will be determined and confirmed during the first certification; this is based on the field history, and the date of notification (organic application) to the CB. For organic operators that are already certified, all new fields (and activities) must be notified to the CB. The date of notification also needs to be kept on file for each plot, as it is needed by the CB to set the start of conversion.

Table 1: Illustration of organic labelling status according to conversion start date and harvest seasons for a perennial crop, cacao

Field ID	Cacao, harvest season October–March			Labelling status		
	Last date non-permitted inputs used	Notification to CB (start of conversion)	Crop planted	Harvest		
				2025/26	2026/27	2027/28
AB.1	2012	2016	2010	Organic	Organic	Organic
AB.2	2019	10 April 2023	June 2021	Conversion Y3	Organic	Organic
AB.3	2019	22 April 2025	June 2024	(No harvest) Conversion Y1	Conversion Y2	Conversion Y3

	<p>Group of operators: New fields added to members' holdings</p> <p>If members of a group of operators add new fields to their holding, they must notify the ICS manager. The date of notification has to be kept on file by the ICS for each field of each member, to track conversion and the organic status of the respective land parcel.</p> <p>Management of fields with different conversion statuses, and changing product labelling categories, can be very challenging to explain and implement with sufficient rigour. The ICS and/or the CB can apply stricter rules as a precautionary measure, for example by stipulating that:</p> <ul style="list-style-type: none"> • in-conversion fields can only be used for the cultivation of other crops, different from those collected as organic in the group's joint marketing system • any farmer with an in-conversion unit that is growing the same crop as that supplied to the joint marketing system is classified as being at the lowest stage of conversion for all production of the certified crops.
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3.2.3 Mixed and parallel production by a farmer

Mixed production (organic and non-organic production, but of different crops)

The EU Organic Regulation allows organic farmers to simultaneously cultivate different crops (or easily distinguishable varieties) under organic and conventional management practices; this is called **mixed production**. However, on a given farm, the same variety, or different varieties that cannot be easily distinguished, cannot be produced at the same time in both a non-organic (conventional) unit and an organic and/or in-conversion unit (see “parallel production” below).



Group of operators: Other products from members that are not sold as organic

Where a group of operators only markets one or a few of the crops that a member grows on their holding, it may be more appropriate to register fields used for home consumption and local sales crops as part of the member's non-organic unit.

The other option is to include these home consumption fields in the organic unit; however, in that case, all EU organic production rules must be met for these crops, and they will be fully controlled during the organic inspection.

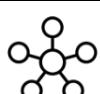
In the case of plots for home consumption, or fields with perennial crops for the local market, if not all of the EU organic production rules can be met consistently, including these fields as part of the member's "non-organic unit" may be the best option, even if they are managed without the use of chemical fertilisers or pesticides. Livestock husbandry for home consumption is usually considered part of the non-organic unit, for the same reason.

Special case of mixed production: parallel production

Under the EU organic rules, a farmer cannot grow annual crops of the same variety (or varieties that cannot be easily differentiated) simultaneously in both their non-organic and organic (and/or in-conversion) units.

However, for perennial crops, the EU Organic Regulation (Art. 9.8) enables CBs to grant a derogation that allows temporary simultaneous production of the same variety (or not easily distinguishable varieties) under organic and non-organic management, but only if *all* of the following conditions are met (in addition to the measures for effective separation).

- The farmer has presented a conversion plan, approved annually by the certification body, which provides that the conversion of all relevant fields begins as soon as possible, and is completed at the latest 5 years after the start of the conversion of the first field. This means that the last conventional field must have started conversion at the latest *2 years after the start of the first field*.
- At least 48 hours in advance, the farmer must notify the CB of the start of the harvest of each of the products concerned.
- Upon completion of the harvest, the farmer must inform the CB of the exact quantities harvested, and the measures put in place to ensure separation of the products.



Group of operators: Parallel production by members

For members of a group of operators, parallel production of the same (or not easily distinguishable) variety under organic and non-organic practices by a member farmer is not *per se* prohibited by the Regulation. However, it is extremely difficult to manage the gradual conversion and separation of production and additional conditions in an ICS with adequate rigour. It is therefore not generally recommended, and if practised it requires extremely close monitoring, support/supervision, and precautionary measures by the ICS. This may involve, for example, ensuring the presence on-farm of ICS officers during harvesting of organic fields (with detailed records).

3.3 Conversion period and retroactive recognition of the conversion period

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Key references in Regulation 2018/848

Art. 10: Conversion: [(1) Conversion period, (2) start of the conversion period, (3) No previous period shall be retroactively recognised, except ... (4) Marketing of production during the conversion period]

Annex II, Part I: 1.7 Conversion: [1.7.1 duration, 1.7.2 extension of conversion, 1.7.3 and 1.7.4 new conversion in case of a treatment with unauthorised substances]

Regulation 2021/1698, Art. 24: Checks to be carried out for the purpose of the retroactive recognition of a previous period [by a recognised CB in non-EU countries]

Conversion is mandatory for each new field where organic production will be practised. During the conversion period, all conventional farming practices are prohibited while the harvested crop(s) cannot yet be labelled as organic.

Start and duration of the conversion period

In countries outside the EU, the conversion period starts when the operator notifies one or more fields for organic production to the CB, and begins to meet all organic production rules. In the case of a farm that is starting for the first time with organic certification, this notification must be done in writing to avoid any errors or misunderstanding. The official start date of conversion of a field is normally confirmed/set by the CB.

The duration of the conversion period depends on the crop. The rules on this aspect have not changed in comparison with the previous EU organic regulation:

- annual crops (e.g. lentils, beans, soy, rice, cotton, chillies, potatoes, herbs): 24 months before sowing
- perennial crops (e.g. tea, coffee, cocoa, mango, avocado, olives, bananas): 36 months before harvest.

For more information, and examples of the conversion and labelling status, see section 3.2.2.

Retroactive recognition of the conversion period

In certain cases, the retroactive recognition of part of the conversion period, before it was notified to the CB, may be possible – but only under strict conditions. These are described in Regulation 2021/1698, Art. 24.

Farmers who want to apply for retroactive recognition should consider whether they have adequate evidence that, for each land parcel, no non-permitted inputs have been used for at least three consecutive years preceding the notification (application for certification) to the CB. Farmers and groups of operators should contact their CB as early as possible to clarify the process and any additional costs.

If a farmer or group of operators decides to apply for retroactive recognition, they must submit the required documentation for each parcel of land. This includes maps that clearly indicate the precise geolocation of the field(s), total surface area, and current activity taking place (including crop types and production details). The CB must then evaluate the information received and carry out a risk assessment for each land parcel. This includes taking samples in line with the risk assessment (a sample will normally be required for agricultural land), and conducting on-site inspections of the respective field(s). Based on the information submitted by the farmer, and the inspector's findings, the CB will write a report giving justification for the recognition.

The CB will also set the “new” official start of the conversion period for each land parcel included in the request. This report must be submitted by the CB to its accreditation body, and to the European Commission.

3.4 Non-use of genetically modified organisms

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Key references in Regulation 2018/848

Art. 11: Prohibition on the use of GMOs

Genetically modified organisms (GMOs) cannot be used in organic production. In the EU Organic Regulation, three different types of product are covered by the term GMO, none of which is permitted in organic production.

- **Genetically modified organisms**, including seeds (e.g. maize, rice, soy) or micro-organisms. In the EU, in accordance with Regulation 1829/2003, Art. 13, such products have to be labelled as GMO. Farmers and other operators in the EU rely on the labelling of agricultural products (including food products) to know whether or not seeds are GMOs.
- **Products produced from GMOs**, such as corn syrup, rice flower, or feed containing GMO soy. In the EU, in accordance with Regulation 1829/2003, Art. 13, such products have to be labelled as “produced from GMO”. Operators in the EU rely on labelling to know whether or not the products are produced from GMO products.
- **Products produced using GMOs** (e.g. citric acid produced by GMO lactic acid bacteria). In the EU, these are not covered by Regulation 1829/2003. Operators using such products, where they have not been certified “organic”, must confirm with their supplier that they are not produced using GMOs.

Outside the EU, operators are not able to rely on the EU legislation on GMO labelling. Instead, when there is a possibility that a purchased product is GMO, operators must ask the supplier for a non-GMO declaration. This must confirm that the product is not GMO, not produced from GMOs, and not produced using GMOs. Operators should contact their CB for details on the procedure and/or forms required.

3.5 Seeds, seedlings, and other plant reproductive material

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Key references in Regulation 2018/848

Annex II, Part I, 1.8: Origin of plants including plant reproductive material (PRM)

Regulation 2021/1698, Art. 25: Authorisations for the use of non-organic plant reproductive material

European Commission, [Frequently asked questions on organic rules](#), section 4.2.1

3.5.1 Using plant reproductive material in organic farming

Depending on the species and the breeding objectives, there are several possible techniques for plant reproduction through seeds, or by vegetative propagation (e.g. tubers, bulbs, seedlings, cuttings, grafting via buds, scions, and rootstock).

All plants or crops marketed as organic must be grown from plant reproductive material (PRM) that conforms to organic standards. Plant reproductive material is defined in the Regulation as “plants and all parts of plants, including seeds, at any stage of growth that are capable of, and intended for, producing entire plants”.

Use of seeds and plant reproductive material (other than seedlings) in organic farming

The basic rules for PRM apply to seeds and vegetative plant reproductive materials such as transplants, root stock, tubers, cuttings, and grafted trees. In the case of seedlings, the rules are slightly different – see next section).

The choice of appropriate varieties is one of the cornerstones of organic production. Unfortunately, the availability of suitable organic seeds and planting stock can be challenging, especially in some non-EU countries where there are no certified organic seed suppliers or plant nurseries.

The basic premise is that farmers should use organic PRM when possible. If not possible, a number of other options are available, but farmers must keep evidence to show that organic PRM was not available.

If organic PRM is not available, the second choice is to use “in-conversion” PRM. When neither “organic” or “in-conversion” PRM is available, the third choice is to use “PRM for use in organic production”, which is harvested from fields in their first 12 months of conversion (Regulation 2018/848, Annex II, Part 1, 1.8.6; see section 3.5.2 of this guide). Outside the EU, farmers are not required to obtain authorisation from their CB before using in-conversion PRM, or PRM “for-use in organic production”.

When no organic, “in-conversion”, or “PRM for use in organic production” material is available, the last remaining option is to use non-organic PRM. In this case, a critical condition is that non-organically produced PRM must not be treated with substances that are not allowed for use in organic production. This includes coating seeds with fungicides, disinfecting seeds with bleach, or dipping transplants in a solution to stimulate root growth. To use this option, a derogation must be granted by the CB for each season and before planting (in line with Annex II, Part 1, 1.8.5.2).

Note that if non-organic treated seeds are used on a plot in the organic or in-conversion unit (even for production of crops for home consumption or non-organic markets), this land will have to undergo a new conversion period.

Use of seedlings for annual crops

Organic farmers may use their own or bought-in organic and in-conversion seedlings. However, the use of non-organic seedlings to grow organic annual crops is not permitted, and CBs cannot grant a derogation for non-organic seedlings. See section 3.5.2 for more information on production of organic or “in-conversion” seedlings.



Group of operators: Supporting members to meet rules on plant reproductive material

In many non-EU countries, members of groups of operators may not have access to organic or even untreated non-organic seeds in their local agricultural store. In this situation, it is often the role of the group ICS to manage the supply of suitable PRM on behalf of all their members. The following options are possible.

- The group can operate an organic nursery and varietal testing programmes. Individual members may be selected to grow organic seeds or produce organic planting stock for all the other group members.
- The group can contract seed companies to provide suitable varieties that are either organic (preferably) or untreated (subject to approval by the CB); in this case detailed traceability records must be kept.
- If no organic sources can be found and no own production is possible, the ICS manager must apply to the CB for a derogation to use GMO-free untreated non-organic seeds or planting stock.

3.5.2 Producing plant reproductive material for use in organic production

To produce recognised organic or in-conversion PRM, the producer must be subject to controls according to EU organic rules (Regulation 2018/848). This means that either:

- the plant reproductive material must be produced by organic or in-conversion farmers themselves (e.g. in a farmer's own nursery, or by selected members of a group of operators), or
- the producer/supplier or nursery must be certified as an organic operator.

The rules for production of PRM for use in organic farming are described in Regulation 2018/848 (Annex II, Part I, 1.8.5.3).

Organic plant reproductive material

According to Regulation 2018/848 (Annex II, Part I, 1.8.2), to obtain PRM that will be used for organic farming (rather than to produce more PRM), the following rules apply.

- Organic PRM for annual crops: the mother plant from which the seeds are harvested must have been grown under organic conditions for at least one generation (i.e. must have been sown in an organic field after the end of the conversion period).
- Organic PRM for perennial crops: the mother plant from which the PRM is taken must have been grown under organic conditions for at least two growing seasons (2 years), counting from the start of the conversion period (if relevant).
- Organic seedlings of annual crops: these must be produced using organic seeds (or in-conversion or authorised non-organic seeds as described in section 3.5.1) on organic fields, or using soil from organic fields in containers for subsequent transplanting. The seedlings must be grown by an organic or in-conversion farmer, using only organic production methods.

“In-conversion” plant reproductive material

For the production of “in-conversion” PRM *other than seedlings*, the mother plant from which the seeds are harvested must have been grown under organic conditions for at least 12 months, counting from the start of the conversion period.

The production of “in-conversion” seedlings may use non-organic non-treated PRM, or “in-conversion” PRM. The rules are described in detail in Annex II, Part I, 1.8.5.1.

Plant reproductive material “for use in organic production” harvested in the first 12 months of conversion

PRM harvested from fields in the first 12 months of conversion (according to Annex II, Part I, 1.8.6) may be used in organic production, if organic or in-conversion PRM is not available. This allows farmers to grow their own seeds for use in organic production right from the start of conversion, i.e. during the 12 months after the start of conversion when products (or PRM) cannot yet be labelled as “in-conversion”.

Further information

Further details on producing PRM for use in organic production can be obtained from your CB, and the European Commission’s [Frequently asked questions on organic rules](#), section 4.2.1.

Organic breeding and seed production are specialised and skilled activities. “Off-the-shelf” training programmes or guidelines are often not available. The situation can be challenging in some countries, especially where organic seed production and breeding is non-existent or in its infancy. The following resources may be helpful.

FiBL resources on production of plant reproductive materials for international producers

[Plant breeding techniques and evaluation for organic farming](#) (available in multiple languages)

[Guide on participatory on-farm breeding of organic cotton](#) introducing trainers to the concepts and methodologies of participatory plant breeding (PPB), and the steps and techniques for implementing PPB and training programmes in cotton

[Organic seedling production for medicinal and aromatic plants](#) (Technical Guide No. 1465)

[Organic Africa Training Manual](#) providing crop-specific guidelines, with simple instructions on the selection and preparation of planting material for banana/plantain, coffee, cacao, mango, rice, citrus, and several crops for home consumption

[Liveseeding.eu](#) provides training courses and technical guides on organic breeding, as well as links to a range of scientific publications on plant breeding, cultivar testing, and development of an organic seeds and breeding sector (targeted at the European organic sector)

3.6 Soil management and fertiliser application

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Key references in Regulation 2018/848:

Annex II, Part I, 1.9: Soil management and fertilisation

Regulation 2021/1165, Annex II (Authorised fertilisers, soil amendments and nutrients)

Soil conservation, erosion control, and fertility management are of central importance in organic crop production and farming. They involve conserving and protecting soils from sun, rain, wind, and compaction; regulated tillage practices; and the appropriate application of organic material (compost, livestock, manure). Soil is covered when possible using cover crops, mulch, and/or trees. Plant diversity and crop rotation are also core elements.

The EU organic rules require that soil fertility and biological activity are maintained and increased in the following ways.

- **Application of own livestock manure or organic matter** (preferably composted). Livestock manure should be applied in quantities of not more than 170 kg nitrogen per year per hectare. If these measures are not enough, livestock manure and poultry manure from outside the farm may be used, but use of manure from factory farming is prohibited.

In addition:

- In the case of annual crops – **multiannual crop rotation**, with mandatory use of leguminous (nitrogen-fixing) crops as the rotation crop, or as cover crops and green manures.
- In the case of perennial crops (other than forage) and in greenhouses – use of **short-term green manure crops and legumes, as well as plant diversity** (for example, in an agroforestry system, by intercropping different crops in rows between the trees).
- Where the above measures are not sufficient for plant nutrition, **authorised soil improvers** can be used “to the extent needed”. These must be authorised (listed in the tables in Annex II or VI of Regulation 2021/1165) and used according to the conditions specified in the tables. For example, by-products of animal origin, such as blood or horn meal, may be used, but only if no chromium is detectable. Preparations of micro-organisms can be used to improve the overall condition of the soil, or to improve the availability of nutrients in the soil or crops. Biodynamic preparations may also be used. **The application of mineral nitrogen fertilisers (e.g. NPK), or any fertilisers or soil amendments not authorised for use in organic farming, is prohibited.** In non-EU countries, most CBs require that any such off-farm inputs are authorised before use (after checks have been made of their origin/content, compliance with all applicable EU rules, and/or verification of the product’s certification).

In organic farming, it is not permitted to grow perennial crops as a monoculture without intercropping and/or leguminous cover crops, or to grow annual crops (even leguminous crops) without crop rotation. Diversification of cropping systems can be achieved in the following ways.

- Crop rotation (e.g. alternating maize and beans in a cereal-legume rotation). Even for crops that do not lend themselves easily to classic crop rotation (e.g. rice), solutions can be found, for example growing mung bean between two rice crops, or sowing cover crops in standing rice which continue to grow after the rice has been harvested.

- Intercropping, alley cropping, and border crops (e.g. young cocoa trees intercropped with banana; mango intercropped with papaya and/or pineapple, or in early stages with vegetables or cereals). Even in arid areas, conditions may allow green manures to be grown during the rainy season and/or in the shade of trees for at least parts of the year.
- Leguminous green manures (e.g. perennial leguminous trees in borders or alleys; leguminous cover crops in plantations; relay planting of green manures between cereal rows; rotation with green manures).
- Cover crops between and around tree crops (e.g. legumes, grasses or other crops that protect the soil and/or suppress weeds).
- Agroforestry systems, combining agricultural crops with raised and protected tree crops (e.g. using alley cropping) and/or sylvopastoral systems combining trees and pasture.

Rotation and intercropping help to meet the nutrient needs of the crop, and at the same time can help to break pest and disease cycles, while harbouring natural enemies of plant pests. More information on farm diversification and crop-specific advice for a range of crops (e.g. coffee, cacao, mango, rice) can be found in the [Organic Africa Training Manual](#), other resources on organic farming listed in section 5.2, and local organic farming manuals.

3.7 Disease, pest, and weed management



Key references in Regulation 2018/848:

Annex II, Part I, 1.10: Pest and weed management

Regulation 2021/1165, Annexes I and VI: Authorised substances and products

Regulation 2021/2119, Art. 2: Records to be kept by operators and groups of operators

In organic production, the prevention of damage by pests, diseases, and weeds must rely primarily on the promotion of natural enemies (encouraged by crop diversity and push–pull systems); selecting suitable crop species and varieties; crop rotation; cultural techniques (including appropriate timing of planting and harvest); mechanical and physical methods (physical removal, protective barriers, traps), and thermal processes such as solarisation. Effective monitoring and surveillance (including with traps) is important to identify when additional measures are needed. These preventive measures need to be documented.

Where preventive measures are not sufficient to prevent damage by pests, weeds, or diseases, farmers may use the authorised plant protection substances listed in Regulation 2021/1165, Annex I or VI.

- Annex I: Active substances included in plant protection products that are authorised for use in organic farming (**in both EU and non-EU countries**). Substances listed in Annex I must be approved in the “horizontal” EU pesticide legislation (Regulation (EC) 1107/2009), and can only be used according to the conditions of use approved in the EU.
- Annex VI (Part A): Additional products and substances that are authorised for use in organic production **in non-EU countries**. This includes the use of micro-organisms, and listed substances including ethylene for flower induction in pineapple. New substances can be added to this Annex when there are justified reasons (e.g. for a pest not present in the EU), after an evaluation by the Expert Group for Technical Advice on Organic Production (EGTOP) Committee, and following the formal EU process to update legislation. A dossier must be submitted to the EU and evaluated by the EU for each new substance, and approval is given for a 2-year period (with the possibility of renewal).

Only active substances explicitly authorised (and listed) in Regulation 2021/1165 can be used in organic production. Uses of some components included in plant protection products are also restricted. It is important to note that certain substances and pest control products previously accepted in non-EU countries under the old “equivalence” regime are no longer permitted. For example, few plant extracts and oils are listed in Annex I (e.g. garlic extract, neem seed extracts, clove oil, citronella oil, pyrethrums extracted from plants, sunflower oil, onion oil), and none is so far listed in Annex VI.

Operators are recommended to verify with their CB whether the products they plan to use meet the new rules, even if these products were approved for use in the past.

When any pest control products are used, appropriate record keeping is essential. This includes identification of the pest, weed, or disease to be controlled; name of the plant protection product and its active substance; date(s); quantity (dose rate); field identifier; and crops for which these products have been used.

More information on organic pest management practices and crop-specific advice (e.g. coffee, cacao, mango, rice) can be found in the [Organic Africa Training Manual](#) and other organic farming publications (see section 5.2).

3.8 Post-harvest activities on the farm

§ Key references in Regulation 2018/848

Annex II, Part I, Section 1.13: Preparation of unprocessed products

Annex II, Part VI Processed Food production rule: Sections 1.2, 1.3, 1.4, 1.5 and 2.2.3 (*via Part I, 1.13*)

If farmers keep hold of their products (remaining as owners) after harvest, and they carry out activities on the farm such as washing, sorting, and packaging (including labelling), they must address any risks of contamination and mixing of organic with other products. The same applies to farmers who outsource those activities while they remain responsible for organic production, for example where a farmer subcontracts a coolhouse for temporary storage of their fresh fruits before exporting in the farm’s own name. Preventing mixing and contamination is also particularly important if farmers use shared facilities, for example where they use village washing or drying stations.

Operators must inform their CB of their post-harvest activities, and explain how they intend to comply with the relevant requirements for organic production. In particular, they must provide details on the precautionary measures they will take to avoid contamination and commingling, ensuring the effective separation of products, and the identification/labelling of the products as organic. Operators must also ensure they are not using any processing aids, ingredients, or auxiliaries that are not permitted in organic production, as well as complying with other production rules.

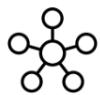
Operators and groups of operators should identify the critical steps. Based on these, they must describe the measures put in place to ensure that contamination and mixing are avoided, and keep records to demonstrate that these precautionary measures have been effectively implemented. After harvest, organic products must always be identifiable and separated from other products. Particular attention should be given to the risks that arise during storage of raw materials and finished products.

Separation can be achieved in two ways:

- separation in **time**: use of the same equipment or installations, but with thorough cleaning before use for organic products
- separation in **space**: use of different equipment or installations for organic and other products.

There are various ways to identify organic products:

- place them in crates that have a colour different from non-organic products (and be consistent with this practice)
- attach to bags a coloured ribbon that is specific for organic products
- use bags that are pre-labelled with the word “organic”, the EU organic logo, or another visual indicator
- print or have labels for organic products ready to attach to crates used for (any) transport.



Group of operators: Post-harvest handling by members

In a group of operators, the members' on-farm preparation and/or processing activities must be described and controlled in the ICS (e.g. drying of spices on mats, fermenting of cocoa pods).

During the ICS inspection, it is very important to consider and control all risks relating to commingling and contamination at the farm level. Risks could include (for example) farmers who also sell products from family members; commingling or contamination during processing at community shared facilities; contamination by using dirty/contaminated sheets for product drying; use of contaminated containers or bags for product storage or transport; use of insect repellent or control in the farmer's house where organic products are stored.

The ICS also needs to address and control any risk of contamination and commingling during collection/purchase from farmers, and during preparation, storage, transport, and handling by the group of operators up to the point of sale. This requires strict checks when products are received from members (including verification of members' organic status, receipt with details, cross-check of yield estimate), as well as separation and product identification.

More information on preparation and handling of organic products can be found in Chapter 4.

3.9 Avoiding contamination and precautionary measures at farm level

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Key references in Regulation 2018/848

Art. 28: Precautionary measures to avoid the presence of non-authorised products and substances

Art. 28 (1): [Precautionary measures]

Art. 28 (2): [Measures by the operator in case of presence of unauthorised substances]

Art. 27: Obligations and actions in the event of suspicion of non-compliance

Regulation 2021/2119, Art. 2.1 (a): [keep necessary documents to allow check of preventive and precautionary measures]

The EU Organic Regulation (Art. 28.1) outlines the precautionary measures that must be taken by the operator or group of operators to avoid the contamination of organic produce with substances that are prohibited. These measures must be applied at all stages from production to preparation/processing and transport/distribution. Avoiding contamination is critically important as there is very low tolerance by the EU authorities of contamination in imported produce, alongside increased sampling (notably of plant protection products). Where contaminants are found, the produce cannot be sold as organic on the EU market.

Risks of contamination must be identified, and then farmers must implement – and document – the measures they take to avoid them. The Regulation specifies that the measures should be “proportionate and appropriate”, but does not prescribe details of what these minimum or “sufficient” precautionary measures should be. In practical terms, farmers should tackle the risks that are under their control.

As noted above, farmers must ensure the separation at all times of the products from non-organic, organic, and in-conversion production units (and the inputs used in them). Farmers must keep records of measures taken to ensure that contamination and/or commingling of organic products is avoided.

Farmers must start by identifying the risks where organic products can become contaminated by defining “organic critical control points”.

Example

Common examples of organic critical control points

- Contamination of organic crops where they border with non-organic farmers (and could be affected by drift)
- Accidental use of prohibited inputs in the organic unit by untrained workers
- Use of prohibited inputs on home consumption crops that are grown in the organic unit
- Shared use of equipment for spraying plant protection products
- Contaminated irrigation water
- Rodent control or fumigation in product storage areas
- Malaria control measures in the community
- Contaminated bags or containers for storing and transporting organic products

Farmers should also identify risks where (or when) organic products may be commingled (i.e. not kept strictly separated from in-conversion or non-organic products). This can happen, for example, during storage or preparation in facilities that are also used by other farmers.

These identified risks must be documented as the information will be required by the CB during audits.

Once risks are identified, farmers must put in place practical measures to avoid them. Examples are giving clear instructions to workers; and clearly labelling sprayers/containers to indicate that they are to be used only for plant protection in organic production.

It is important that records must be kept of the measures taken, along with evidence that they have been implemented as required. Examples are protocols and records for cleaning farm equipment and transport vehicles or containers, or records of regular training of farm workers.

Finally, the identified critical control points and measures need to be reviewed regularly and updated as necessary.

Examples

Risks and precautionary measures

In a farm where **all fields (and all animals) are under organic management**, the risk of contamination is limited to contamination from outside (e.g. pesticide drift). Informing conventional (non-organic) neighbouring farmers, and agreeing with them on a no-spray zone, is an example of a precautionary measure to mitigate the risk of pesticide drift from the neighbour onto the organic crops. Clearly marking the borders of organic fields, and/or establishing dense hedges and no-harvest zones, are other examples.

In a farm with **both organic and non-organic production units**, in addition to the risks from outside, there is a higher risk of internal contamination with unauthorised substances. Clear and effective identification and separation is needed during the storage of inputs and harvested produce. Particular attention must be given to the labelling and cleaning of any equipment used in both production units. Internal training, and regular internal checks, are also examples of measures taken to avoid mistakes and/or contamination.

In addition to contamination, there are also risks of mislabelling, mixing, or even substitution of organic and in-conversion and/or conventional products. Operators must mitigate these risks, especially where farmers use shared facilities for processing or storing their products, or where there could be a risk of (for example) individuals selling products from uncertified family members as organic at a premium price.

Precautionary measures to prevent contamination and commingling are particularly important during the stages of further physical handling of organic products after they leave the farm. In the case of members of a group of operators, these are the purchase centres/collection points of the group. In the case of direct sales by the farm, these are the other operators involved in the preparation, storage, or export of organic products. See Chapter 4 on precautionary measures during the handling of organic products beyond farm production.



Group of operators: Precautionary measures

In a group of operators, the identification of risks, definition of precautionary measures, and records of their implementation may be done by the ICS. The risk analysis and precautionary measures should consider risks for contamination and commingling at farm level, as well as for product handling at the level of the group and joint marketing system. If the production system and risks vary slightly between different regions or types of farmers, this must be considered in the risk analysis and definition of measures (for example, where there is variation in activities in neighbouring areas, the type of intercrops grown, or the purchase centre used for produce collection).

Cleaning, disinfection, and facility pest management (farm level)

The EU organic rules (Regulation 2021/1165, Annex IV) foresee that there will be a list of products authorised for cleaning and disinfection in organic production. In the case of plant production and post-harvest-handling, there will be lists of authorised substances/products for:

- cleaning and disinfection of buildings and installations used for plant production, including for storage on the agricultural holding
- cleaning and disinfection in processing and storage facilities.

In 2025, at the time of writing this guide, Annex IV is empty. However, the EU is evaluating a number of cleaning/disinfection substances for use in plant and livestock production. Evaluation of substances for food processing (with and without food contact) is planned for 2027/2028⁹.

While the lists of authorised products in Annex IV remain empty, operators can use products and substances that are permitted at national level (in the exporting country) for cleaning and disinfection for food. Care is needed to apply precautionary measures that prevent the contamination of organic products.

In addition to cleaning and disinfection, care has to be taken to prevent any contamination of organic products from disinfestation and pest control activities. Operators should always confirm with their CB that their planned cleaning and disinfection practices, as well as facility pest management control procedures, are compliant with the regulations, and must keep records of all associated activities, use of substances, and preventive measures.

Presence of unauthorised substances – measures by the farmer

As required by Regulation 2018/848 (Arts. 28.2 and 27), operators must take immediate action where there is suspected non-compliance of organic products, and specifically where they find traces of unauthorised substances in their own residue analysis. They must:

⁹ The [EGTOP Final Report on Cleaning and Disinfection \(III\)](#) (December 2024) provides insights on the current status of progress and the EGTOP work schedule. Another EGTOP report on the topic is in progress.

1. separate and block all related product lots; **no sales as organic**
2. investigate the suspicion according to internal procedures
3. if the result of the investigation enables the “suspicion to be eliminated”, release the products and maintain documentation of the outcome
4. if the investigation is not conclusive, or the suspicion is substantiated (e.g. the harvest on certain days was contaminated by use of contaminated crates), the CB must be notified immediately.

See further information in section 4.1.

3.10 Record-keeping (at farm level)

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Key references in Regulation 2018/848

Annex II, Part I: points 1.9.3 [records of fertilisers used], 1.10.2 [records for plant protection], 1.11 [records of cleaning and disinfection products], and 1.12 records on parcels, harvest, input use]
 Regulation 2021/2119, Art. 2: Records to be kept by operators and groups of operators

In certified organic production, record keeping is vital. Records are important because inspectors use them to evaluate if organic operations are appropriate and are implemented as reported by the farmer.

Farmers must keep records on fertiliser application, plant protection, cleaning/disinfection, and production-related activities at field level (e.g. sowing, weeding, pruning, and harvesting). Records should be kept in a safe place at the farm. Farmers must also keep stock and financial records (e.g. invoices coming in/going out).

Records that will be requested by the CB during the annual inspection include those related to:

- precautionary measures
- activities in the field (land preparation, applying compost and/or fertilisers, sowing, weeding, application of plant protection products, pruning, harvest)
- documents accompanying products during or after transport (delivery note, packing list, bill of lading).

In the case of post-harvest activities, farmers must also keep records for the purposes of mass balance and traceability checks.

3.11 Rules for wild collection and specific products

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Key references in Regulation 2018/848

Annex II, Part I, section 2.1: Rules on mushroom production
 Annex II, Part I, section 2.2: Rules concerning the collection of wild plants
 Annex I: Other products referred to in Art. 2 (1)

Wild collection

Wild collection, or wild harvest of plants, is considered as “plant production” under Regulation 2018/848 (Annex II, Part I, section 2.2). The collection of wild plants growing naturally in natural areas, forests, and agricultural areas can be considered as organic production, provided that for at least 3 years before collection those areas were not treated with unauthorised substances, and that collection does not affect

the stability of the natural habitat or the maintenance of the species in the collection area. Operators must keep detailed records of the period and location of collection, as well as the species and quantity of wild plants collected.

These rules have not changed materially compared with the previous EU organic rules.

Wild collection in defined natural areas or forests can continue to be certified as “wild plant collection”. However, the situation is less clear where wild collection operations include agricultural activities, or have similarities with agricultural production by groups of operators. Examples are where collectors gather the same product in wild communal forest as well as at their homesteads; or where a wild collection company also contracts some collectors to grow the same plant species on their farms. It is therefore recommended that all “wild collection” activities should be discussed with and evaluated by the CB to determine how best they can be certified in compliance with Regulation 2018/848 (e.g. as wild collection or agricultural production; as a group of operators or individual farm operator).

Product scope and rules for specific products

The bulk of the EU Organic Regulation applies to:

- live or unprocessed agricultural products, and plant reproductive material
- processed agricultural products for use as food
- feed for animals.

In addition, the Regulation applies to certain other products, which are listed in Annex I. Examples are cotton (not carded or combed), essential oils, and plant-based traditional herbal preparations.

Production of organic mushrooms

There are specific rules for production of organic mushrooms (Annex II, Part I, section 2.1).

Special situation of organic cotton

For organic cotton, farmers and producer groups do not necessarily need to change to compliance with Regulation 2018/848. While the scope of the Organic Regulation includes “cotton, not carded or combed” (Annex I), organic cotton is typically imported into the EU as yarn, fabric, or garments, which fall outside the scope of the Regulation. Imports of these cotton products are not regulated under the EU organic import system. Product labelling is under private organic textile standards such as the Global Organic Textile Standard (GOTS) or Textile Exchange, which set their own standards for cotton production. GOTS accepts all organic standards in the IFOAM family of standards for cotton production.

4. REQUIREMENTS FOR PREPARATION, HANDLING, AND MARKETING OF ORGANIC PRODUCTS

4.1 Separation and precautionary measures

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Key references in Regulation 2018/848

Art. 9.6: [Preventive and precautionary measures shall be taken]

Art. 28: Precautionary measures to avoid the presence of non-authorised products and substance

Annex II, Part I: point 1.13, Preparation of unprocessed products

Annex II, Part IV: Processed food production rules

All operators working with organic products have the obligation to identify organic (and “in-conversion”) products at all stages; to keep organic products separated from other agricultural products; and to prevent contamination with products and substances that are not permitted. This obligation becomes particularly important post-harvest, when organic products from various farmers are received, stored, aggregated, and/or packaged into new, often bigger lots for export to Europe. It is not an easy task because there are multiple opportunities for these obligations to be compromised, especially where the organic products are handled in units that collect, store, or process the same product in different organic qualities (organic and in-conversion) and/or non-organic.

In the case of handling operations that handle both organic and non-organic products, the risk for contamination (and in certain cases also commingling, e.g. mixing organic and non-organic products) is considerably greater, so strong and consistently implemented precautionary measures are needed. The basic rules for checking incoming organic goods to confirm their organic status, and separation and identification measures, also apply in a fully organic unit, as full traceability of product lots exported to Europe must always be guaranteed.

Any legal entity that physically or financially handles organic or in-conversion products for export to Europe is subject to organic control by a recognised CB, according to Regulation 2018/848. This means either:

- certification as an “operator” or “group of operators¹⁰” for the relevant activities (e.g. preparation, storage, and export of organic products), or
- the legal entity can be controlled as a subcontracted unit (e.g. a subcontracted processing unit) where another organic operator (e.g. the exporter) remains responsible for compliance with the Regulation (and owns the product during the subcontracted step). In this case, the subcontracted unit (e.g. subcontracted processor) will be listed on the organic certificate of the entity that subcontracts the service and remains responsible (e.g. the exporter) in a specific section.

¹⁰ If the group is composed of farmers as members, and meets the rules of Art. 36.1; see section 2.2 of this guide.

For more overview information on control of all entities involved in the handling of organic products, see section 2.1 of this guide. Control bodies can also provide details.

New rules on documented precautionary measures to be taken by operators

According to the new rules of Art. 28.1, operators must implement the following steps to identify risks and put in place effective precautionary measures to avoid the contamination or mixing of organic products.

1. Take measures to **identify risks and critical steps** (from reception of products to dispatch) – identify **organic critical control points** for avoidance of contamination (equivalent to hazard analysis and critical control points, HACCP, for hygiene risks).
2. Put in place and maintain **proportionate and appropriate measures to avoid contamination** – for example, strict reception of incoming goods; cleaning procedures for equipment; protocol of processing organic products in continuous batches and at the start of the week or on fixed days.
3. Keep records that **prove implementation** and review regularly to ensure measures are adequate. For example, record checks of incoming goods, label checks, cleaning records, proof of staff training.

Effective separation and precautionary measures in different settings

All operators must start by identifying the moments (time) and locations (space) where maintaining separation may be a problem if not adequately managed. The easiest way to do this is to follow the pathway of the organic product from the moment it arrives until the moment it leaves and, along the way, to identify the points where it could come into contact with conventional products (especially when they are similar), or with products and substances that cannot be used in organic production.

There may be significant differences in the risk level – and precautionary measures required – according to the circumstances, and how the operators handle and market organic products.

Example

Risk levels

- Operator handles only certified organic products – **lowest risk**, mainly involving risk of external contamination.
- Operator handles the same product (e.g. coffee) in both organic and non-organic quality – **high risk** for commingling and contamination.
- Operator handles the organic product only in organic quality (e.g. coffee), but also handles other non-organic products (e.g. non-organic cacao) – **high risk** for contamination, but **lower risk** for commingling.
- Operator handles the same product in both organic and “in-conversion” quality – **high risk** of commingling, but **low risk** of contamination.
- Operator handles the same product, which is certified according to different organic certification schemes (e.g. coffee from EU-certified suppliers and non-organic coffee from non-certified suppliers) – **risk** of commingling but **low risk** of contamination.
- Any combination of the cases described above (e.g. farming organic and conversion coffee, and also a non-organic unit for bananas) – **risk** of commingling and contamination.

Please note that separation can only be successful if the organic (and “in-conversion”) products are properly identifiable (as organic or “in-conversion”) and labelled to ensure traceability (e.g. with a lot number).

Precautionary measure at reception: check of incoming organic products

The first location (and one of the most important) where incoming organic products must be separated from other incoming products is at the entrance gate of a purchase centre or preparation unit (including warehouses). Operators must verify coherence between the packaging of the organic products and the accompanying documentation (transport document, packing list, delivery note, and original order note). They must also record the result of this check, and keep it for verification by the inspector later on. In the event of non-coherence or doubts, the products concerned must be isolated from other organic products, cannot be used in organic production, and must not be stored together with other organic products until any doubts about the organic status have been clarified (see Art. 28.2).

In the context of good organic practices, there are some specific situations to consider for the checking of incoming products.

- **Organic products supplied in bulk.** These deliveries require particular attention because of the risk of careless or improper operations during transport (e.g. change of container, substitution, adding products not mentioned in the documentation). Once received, they may be mixed with other deliveries (especially if short of space), or stored in such a way that isolating them afterwards is not possible. If the receiving operator is handling the same product in both organic and conventional quality, there is also a risk of mixing, or contamination if the organic produce should come in contact with surfaces where conventional products have been stored (e.g. wooden boxes, concrete floors, conveyor belts that have not been properly cleaned).
- **Organic products supplied in packaging material not sealed by the supplier.** These deliveries are also higher risk, for reasons similar to those affecting bulk products.
- **Organic products received by a subcontractor.** In this case, the responsible operator must provide clear and comprehensive instructions about how to manage the reception of organic products.

Other potential risks and tips for good practice

Other potential risks for commingling and contamination depend on the operator’s specific circumstances, as in the following examples.

- Storage of raw materials: to avoid contamination and mixing: organic products must be stored in clearly labelled containers, and in locations dedicated to the storage of organic products (also labelled as such).
- Careful handling: during washing, sorting, peeling, and other “light” operations, organic products come into contact with utensils (brushes, knives, etc.) and surfaces that may also be used for handling non-organic products. Direct and indirect contact with substances that cannot be used in organic production can be avoided by abundant rinsing with (warm) water after cleaning, and by starting each day with the handling of organic products on a cleaned preparation line.
- Registration of lots and production in the data management system: to avoid any misunderstandings, it is recommended that a specific symbol (or code/reference) is used for organic products (see Regulation 2021/2119, Art. 2). Adding “BIO”, “ORG”, or simply an “O”, for example, ensures that organic batches are easily identifiable in the system.

- Training: employees should receive instruction in the particularities of organic products and organic production.
- Internal audits: these should be organised to ensure implementation of the following measures:
 - sampling and testing to verify effectiveness of the measures in place
 - internal mass balance and traceability checks to provide a thorough understanding of the completeness and correctness of internal record keeping (this will in any event be carried out the external certifier)
 - follow-up of internal audits and/or external certification decisions, for example regarding the downgrading of organic lots.
- Supplier audits: these can be used to identify any weak points in the supply chain, along with familiarisation with the supplier's working methods.
- Checking certificates: regular checks should be carried out to verify the validity of the supplier's certificate.

4.2 Rules for farmgate collection and purchase from members by group of operators

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Key references in Regulation 2018/848

Annex III Collection, packaging, transport and storage of organic products

For groups of operators also:

Art. 36.1(g) ICS requirements, Regulation 2021/279, Art. 5 (ICS records), Regulation 2021/771, Art. 2 (ICS control of purchase centres)

Collection tours and purchase centres

The key principles of precautionary measures and separation are important for the collection of organic products from operators, and also from groups of operators, by purchase centres that collect and consolidate products for further preparation and storage until export.

A driver may collect and transport organic, "in-conversion", and/or non-organic products (Annex III, point 1). Under EU rules, this type of transportation is allowed provided that the products of different quality are always physically separated and identifiable. The driver is responsible for making sure that any possible mixing or exchange is prevented during transport, loading, and/or unloading. In addition, the operator responsible for such transport must keep detailed records of the circuit (date, time, and quantities) and the names of the operators at the collection point.



Group of operators: Particularities for collection and purchase

Defined ICS procedures and traceability records should ensure that organic rules are adhered to during purchase and handling of the product up to the point of sale by a group of operators.

Where a group operates **purchase centres**, farmers transport their products to their assigned central collection point for sale to the group. The purchase centre staff must verify the farmer's details, including their organic certification status according to the ICS members list. The quantities delivered (plus previous sales to the group in the same season) must also be cross-checked with the yield estimate in the ICS members list.

Where a group operates a **farm collection system**, at the end of the “tour”, the records must be cross-checked against members' organic status and harvest estimates.

Traceability records and best practices

- The group's ICS procedures and traceability records should enable the tracing of all products of all members throughout all stages (production, processing, preparation, and placing on the market).
- Detailed records should be kept on the amounts bought from each farmer, with dates and aggregation into lots for storage and further handling. Traceability records must allow the group to trace back each lot to the farmers who contributed to it.
- It is very important that purchase staff understand the organic rules, and that purchase is organised in a way that prevents the risk of accidental mixing and contamination during the busy purchase season as much as possible.

4.3 Transport and packaging



Key references in Regulation 2018/848

Annex III Collection, packaging, transport and storage of organic products: Section 2. Packaging and transport of products to other operators or units

During transport of organic products to other operators or to other units, products must be transported in appropriate packaging, containers, or vehicles that are closed such that they cannot be altered without manipulation or damage of the seal.

There are some exceptions where the closing of containers or vehicles between different operators is not required:

- direct transport (no stop over) between two organic operators
- all the transported products are organic
- the products are accompanied by documentation (see previous point for the details of such documentation); and
- the shipping and receiving operator keep documentary records of the transport and make them available for control.

During transport of organic products to other operators or units, the product packaging should include the following information (on the label or, if not, in a document accompanying the products):

- name and address of the operator and, where different, the owner or seller of the product
- name of the product
- name and code number of the control authority or CB to which the (shipping) operator is subject
- identification of the product with correct organic status (e.g. “organic”, or “EU-organic” if the operator handles products with different organic labels)
- where relevant, a lot number or other identification mark agreed with the CB, that permits the product lot to be linked with the (sending) operator’s records.

4.4 Storage

§

Key references in Regulation 2018/848

Annex III: Collection, packaging, transport and storage of organic products, Section 7, Storage of organic products

Incoming and outgoing organic products must be registered in the data management system by indicating the lot identification, date, and volume.

Where incoming products change container, containers must be appropriate for the storage of organic products either by being cleaned and disinfected, or by using containers that are exclusively for organic products.

Changing atmospheric conditions by reducing the amount of oxygen (in favour of a relative increase in the amount of nitrogen) is permitted in storage of organic products. Regulation of temperature and moisture is also permitted.

Only authorised products and substances may be used for cleaning and disinfection of the storage unit (Regulation 2021/1165, Annex VI). The process must be organised so that there is no contact between the organic products and the agents used for cleaning and disinfection.

Specific attention must be given to pest control of storage units to avoid the risk of contamination. As a general rule, only authorised substances for pest control may be used. Where traps or dispensers are used (other than pheromone traps), they must prevent the release of substances into the environment, and prevent contact between the substance and the crops. In cases of severe infestation problems despite preventive and precautionary measures, operators are advised to contact their CB to agree on appropriate measures.

To avoid human error, it is recommended that signage is used to clearly identify areas used for the storage of organic products. Warehouse staff should be trained in organic handling rules.

4.5 Preparation (including processing)

§	Key references in Regulation 2018/848
	Art. 3: Definitions:
	Art. 25.4 [Provisional authorisation of non-organic agricultural ingredients in third countries]
	Annex II, Part I: Section 1.13
	Annex II, Part IV: Rules for production of processed food

The term “preparation” as used in the Organic Regulation includes several “product handling” activities. (Note that not everything post-harvest is “preparation”; e.g. a farmer storing or packing organic fruits in a crate is not preparation.) The term “processing” is also defined more specifically in the EU Organic Regulation than commonly used elsewhere.

“Preparation” covers activities that may or may not change the nature of the product. The following activities are considered as preparation.

- Preservation: activities intended to increase the shelf life of products, but without processing (e.g. washing and adding salt).
- Processing: any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion, or a combination of these.
- Any other operation that is carried out on an unprocessed product without altering the product, such as cutting, cleaning, or milling.
- Packaging, labelling, or changing the labelling relating to organic production.

Preparation of unprocessed products

If preparation operations other than “processing” (see next section) are carried out on plants (e.g. washing, milling, cleaning, cutting, packaging), the general requirements for the production of processed food (in Annex II, Part IV) apply even for preparation of unprocessed food. This means in particular that operators must do the following.

- Establish and update appropriate procedures based on a systematic identification of critical processing steps. The application of these procedures must ensure that the processed products comply with the Organic Regulation at all times.
- Take (and keep records of) precautionary measures.
- Implement suitable cleaning measures, monitor their effectiveness, and keep records.
- Guarantee that non-organic products are not placed on the market with any indication referring to organic production.
- Keep organic, in-conversion, and non-organic products separate from each other in time and space. Where organic, in-conversion, and non-organic products, in any combination, are prepared or stored in the same preparation unit, the operator must:

- carry out entire production runs, separately in place and time from similar operations performed on other product qualities (organic, in-conversion, or non-organic)
- maintain an updated register of all operations and quantities processed
- take the necessary measures to ensure identification of lots and avoid mixtures or exchanges between organic, in-conversion, and non-organic products
- carry out operations on organic or in-conversion products only after appropriate cleaning of the production equipment.
- Use cleaning and disinfection products that are authorised for organic production, and keep records of use. Regulation 2021/1165 (Annex IV) will at some point list the authorised products, but this work is still in progress. In the meantime, operators can use products and substances that are permitted for cleaning and disinfection at national level for food production.

Specific rules for production of processed food

Regulation 2018/848 specifies additional rules for the production of processed food (Annex II, Part IV). Despite the clear definitions provided, it is not always clear whether a certain product is considered as “processed” or “unprocessed” in the organic context, as definitions are also given in other EU legislation. Operators should check their organic certificate for the product category indicated, and seek advice from their CB in case of doubt.

Processing operators are advised to read Annex II, Part IV in detail. In addition to the general rules described in sections 1.2 to 1.5, there are additional rules on the use of micro-organisms and food enzymes (2.2.2a), flavours (2.2.2b), natural colours (2.2.2), water and salt, and minerals. Additives, processing aids, and non-organic ingredients may only be used if authorised in Regulation 2021/1165, Annex V. Where operators outside the EU are using non-organic ingredients, their CB can grant temporary exceptions (according to the procedures outlined in Regulation 2018/848, Art. 25.4).

4.6 Labelling organic products (including product composition rules)

<p>§ Key references in Regulation 2018/848</p> <p>Art. 3: Definitions</p> <p>Art. 25.4: [Short-term authorisation of non-organic agricultural ingredients for third country operators]</p> <p>Art. 30: Use of terms referring to organic production</p> <p>Art. 32: Compulsory indications</p> <p>Art. 33: Organic production logo of the European Union</p> <p>Regulation 2021/1165, Annex V: Authorised products and substances for use in the production of processed organic food</p>

In all cases, labelling must reflect the content of the packaging. Labelling must also be consistent with the information provided in the documents that accompany the products (e.g. transport papers, transaction certificates).

Conditions for labelling products as “organic” on product packaging

Agricultural products may be labelled as “organic” by a certified operator, provided that:

- all (or at the very least 95%) of the agricultural ingredients are organic, and
- any non-agricultural ingredients (e.g. food additives, processing aids) present in or used during production are authorised for use in EU organic production. Additives and processing aids must be listed as authorised substances in Annex V, Section A of Regulation 2021/1165. Other permitted ingredients, such as salt, vitamins, flavours, or enzymes, must meet the rules of Annex II, Part IV, 2.2.

There is an exception whereby a maximum of 5% of non-organic agricultural ingredients may be used, provided that they are listed in Regulation 2021/1165, Annex V, Part B (authorised non-organic agricultural ingredients, recognised as not being commercially available at EU level). In countries outside the EU, such non-organic agricultural ingredients can be exceptionally authorised by a CB for a limited period (Art. 25.4).

Please note that the minimum 95% organic ingredients is calculated based on the total weight of all agricultural ingredients (without counting the salt, water, additives, or non-agricultural ingredients).

Example

Harissa with 800 g organic chilli, 180 g garlic, 18 g salt, and 2% citric acid for conservation

Total of agricultural ingredients: 980%.

The minimum 95% rule means that both the chilli and the garlic must be organic (even if organic garlic is not easily available). If only the 800 g chilli is organic, the organic content would be $(800/980 \text{ g}) = 81.6\%$.

In this case, it would only be possible to indicate the organic quality of the chilli in the ingredient statement, but the harissa could not be certified as an organic product.

If the chilli and the garlic are organic, then 100% of agricultural ingredients are organic.

The labelling rules, and the way percentages are calculated for processed products, are described in Art. 31 and Annex II, Part IV, point 2.2.4.

In non-EU countries, the use of the EU logo for organic production is optional (Art. 33.3). Until further notice, where it is used, the origin of the agricultural ingredients must be indicated directly under the EU logo (Art. 32.2).

Labelling of in-conversion products on packaging

Agricultural products may be labelled as “in-conversion” provided that they are of plant origin and contain only one ingredient. “In-conversion” products may be processed (e.g. dried fruit or coconut oil).

Reference to the control body is mandatory. The use of the EU logo for organic production is not permitted.

Use of terms in the accompanying documents

When the term “organic” is used in packaging, reference must be made in the accompanying documents to the control body of the operator supplying or selling the product (Art. 32.1a).

In cases where prepacked products are sold by a distributor, references to the control body in the packaging and accompanying documents may be different.

4.7 Measures in the event of suspected non-compliance or presence of unauthorised substances

§	<p>Key references in Regulation 2018/848</p> <p>Art. 27 Obligations and actions in the event of suspicion of non-compliance</p> <p>Art. 28 (2) [Measures by the operator in case of presence of unauthorised substances]</p> <p>Art. 29 Measures to be taken in the event of the presence of non-authorised products or substances</p> <p>Regulation 2021/279, Art. 1: Procedural steps to be followed by the operator in case of a suspicion of non-compliance due to the presence of non-authorised products or substances</p>
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Measures by the operator when unauthorised substances are detected or suspected

In the event that unauthorised substances are detected during residue analysis, organic operators are obliged to follow the procedure outlined in Regulation 2018/848, Art. 28.2:

- initial check if the result is valid: check if sampling was done correctly and if the analytical results are for a product (or from a producer) that is certified organic
- identify, separate, and block any related product lots; these cannot be marketed or labelled as organic
- investigate the cause of the contamination according to internal procedures, as agreed with the CB.

If, as a result of the investigation, it is possible to “eliminate the suspicion”, the operator can release the products as organic and must maintain documentation of the investigation and outcome.

If the investigation is not sufficiently conclusive to “eliminate the suspicion”, or the suspicion is substantiated, the CB must be notified immediately. The products concerned cannot be marketed as organic.

When an operator informs the CB about a substantiated suspicion, or when the suspicion cannot be eliminated, the operator must provide the CB with the following information (as available):

- information and documents about the supplier (delivery note, invoice, supplier certificate, Certificate of Inspection (COI) for organic products)
- product traceability including lot identification, stock quantity, and quantity of product sold
- test results from an accredited laboratory (when available)
- sampling sheet detailing the time, place, and method used to take the sample
- information about any previous suspicion with regard to the non-authorised substance concerned, or other document relevant to clarifying the case.

Suppliers in non-EU countries may also notice the effect of these stricter new rules when internal quality testing by their EU customers indicates traces of unauthorised substances, as importers are being obliged to notify more cases to authorities and control bodies under the new rules.

Measures by the CB or EU authorities in the event of unauthorised substances being present

Where a competent authority in the importing country, or a CB, receives substantiated information about the presence of unauthorised substances, or detects such products or substances in an organic product, it must immediately carry out an official investigation to determine the source and the cause of the contamination.

Procedures for the investigation are described in Regulation [2021/279](#), Art. 2, and involve blocking the organic lots in question until the results are clear. The investigation needs to include:

- details of the products concerned and whether they are still placed (for sale) on the EU market as organic or in-conversion (possibly also by other supply chain actors)
- details on the contamination found and where it was detected
- results of previous official investigations on the products and operators concerned.

The official investigation must reach a conclusion on the integrity of the organic and in-conversion products, and the source and cause of the contamination (presence of non-authorised substances). The conclusion must be documented in a final report for each official investigation.

The exchange of information between competent authorities (including the European Commission) and CBs in the event of cases of “substantiated” suspicion of non-compliance takes place in the EU Organic Farming Information System (OFIS). Only EU authorities can access each case fully.

Additional resources

[FiBL Guidance for companies on dealing with suspicions of non-compliance](#)

[A Vade Mecum on Official Investigation in Organic Products](#): Report on common contaminants, laboratory analysis, potential sources and pathways of contamination, and official investigation in organic products

Measures by the operator in the event of (other) suspected non-compliances

Regulation 2018/848 (Art. 27) requires operators to take action in the event of any suspected non-compliances, even beyond findings of unauthorised substances.

Example

Other suspected non-compliance

In the case of a processor, during reception of products from an organic supplier, the product label is incomplete or misses a reference to organic quality.

During internal quality visits of supplying farmers, the quality system (QS) staff notice suspicious irregularities that may indicate a critical non-compliance (e.g. signs of herbicide use).

The required procedure is similar to the procedure in the case of unauthorised substances.

1. Carry out an initial check of the situation (e.g. has the label fallen off the product during transport; have products from this supplier been collected already?).
2. Identify, separate, and block any related product lots; these cannot be marketed or labelled as organic until the situation has been resolved.
3. Clarify and further investigate the suspicion (e.g. additional visit of supplier with sampling) and correct the non-conformity if possible (e.g. re-attach the label if the organic origin is proven).

4. If the suspicion can be “eliminated”, and/or the related non-conformity is fully corrected, the operator can release the products as organic, and must maintain documentation of the case.
5. If doubts affecting the organic integrity remain, or the suspicion is substantiated, the CB must be notified immediately.

4.8 Buying and selling organic products; incoming goods control

§	<p>Key references in Regulation 2018/848</p> <p>Art. 35.6: [Operators shall verify the certificates of those operators that are their suppliers]</p> <p>Art. 45: Import of organic and in-conversion products</p> <p>Regulation 2021/1378, Art. 1 and Annex I: Third Country Certificate</p>
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Buying organic products

Before exporting organic products to the EU, the products must be traceable back to the operators and/or groups of operators involved in their production. This means that all operators buying organic products, as well as their suppliers, must be in possession of a certificate in compliance with the EU Organic Regulation¹¹.

The best way to ensure this traceability is by verifying the supplier’s compliance certificate, ideally before placing the order. New certificates under Regulation 2018/848 are issued in the electronic database TRACES, and are signed electronically. As well as the activity and the product category, the certificate also contains the list of products/articles (box 7 of the certificate) that the certified operation may sell as organic. It is important to verify that the product(s) of interest are listed in the certificate. If the supplier sends an electronic copy of the certificate, it is important to check the date of validity (box 9).

After ordering, products will be delivered or collected by the buyer at the agreed point. Here there is a change of ownership, which comes with a change in responsibility for maintaining the integrity of the organic products. At this point, the buyer (or new owner) must verify the organic quality and coherence between the products and the documentation accompanying them (see section 4.1). The result of the incoming goods check must be recorded and kept available for potential verification by the inspector. In the event of non-coherence or doubts, the products must not be used in organic production, and must be kept separate until clarification.

Selling organic products

Operators selling and physically shipping organic products to their clients must ensure that the products are packaged in a clean container to avoid contamination.

There are two possibilities for documentation on arrival:

- the seller ships the products with a packing list and transport document (or combined), or
- the seller agrees with the buyer that the buyer will establish a document containing details of the products upon arrival.

¹¹ Alternatively, suppliers can be certified in compliance with non-EU national legislation for organic production that has been recognised by an equivalency arrangement or a trade agreement with the EU, if all conditions for recognition are met (see section 1.1). This can be relevant for operators in countries with only partial recognition (e.g. processors in India need to be certified in compliance with Regulation 2018/848 for export to Europe, but they can buy from organic farms with an Indian National Programme or organic certificate by an EU recognised CB (farm production certified under the national programme, not the EU Regulation)).

The accompanying document must contain information about the organic product, including type, volume, and lot number. It must also contain reference to the CB that issued the certificate of the seller.

4.9 Export to the EU

§	<p>Key references in Regulation 2018/848</p> <p>Art. 45: Import of organic and in-conversion products</p> <p>Regulation 2021/1698, Art. 16: Verification of consignments intended for import into the Union, Art. 8: High Risk products</p> <p>Regulation 2021/2306: rules on the official controls in respect of consignments of organic products and in-conversion products intended for import into the Union and on the certificate of inspection</p>
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The EU Organic Regulation defines the exporter as the operator that has packaged the products before shipment to the EU¹². All shipments of organic products imported into the EU must be covered by an electronic Certificate of Inspection (COI). The COI can only be issued by a CB recognised by the EU and listed in TRACES NT, the electronic database for issuing COIs.

The COI has various sections:

- information about the issuing body and the type of import (boxes 1 and 2)
- information about the consignment (boxes 3 to 17)
- declaration of the issuing body confirming compliance either with the EU Organic Regulation, or with national organic legislation as mentioned in the equivalency arrangement or in the trade agreement (box 18)
- information relevant for release for free circulation in the EU (boxes 19 to 31).

Technically, it is possible for “exporters” to have access to TRACES NT and to add the details about the consignment (boxes 3 to 17). They can also upload relevant documentation (packing list, CMR consignment note for road transport, bill of lading, analytical results, transport plan, etc.).

Issuing COIs in TRACES NT can only be done when the “exporter” and importer are certified operators, and are registered in TRACES NT by the CB. The COI must be issued before the shipment leaves the country of dispatch.

The COI and accompanying documentation are verified by the customs authorities in the EU Member State (country) where the product enters the EU. Only products with a valid and correct COI can be customs cleared as “organic” products. Once the product has been imported into the EU as organic, it can be traded within and between EU Member States without the need for a COI.

¹² Regulation 2021/2306, Annex I (box 5), Exporter: 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 Art. 3.

Export of high-risk products

In the case of consignments of high-risk products (where a product is designated by the European Commission as “high risk” according to Art. 8 of Regulation 2021/1698¹³), additional checks apply:

- the CB must carry out physical checks, and take at least one representative sample in accordance with the percentage specified in the high-risk product list (e.g. 5% of shipments); the results must be ready before the COI is issued
- the control authority or CB must have complete documentation for traceability of the operators/groups of operators and the product, including transport and commercial documents, and invoices.

¹³ The list of high-risk products will be published as a secondary Regulation. Since 2022, while the secondary act has been in preparation, the list has been published as the working document on additional official controls and the letter to CBs on the imports of organic products from certain countries (see [European Commission: Trade in organics](#)).

5. FINDING MORE INFORMATION

5.1 The EU organic regulatory system: finding the relevant rules

The Organic Regulation 2018 replaced the earlier Regulation (EC) 834/2007 that had been in place since 2007. The Basic Act of Organic Regulation 2018/848 was published in 2018 and came into force in January 2022. It is supplemented by numerous “Implementing” and “Delegated” acts. “Delegated Amending Regulations” modify either the Basic Act or secondary regulations, and these changes are later incorporated into “consolidated versions”. However, the original amending regulations remain the legally binding text.

For information on Regulation [2018/848](#), and new and upcoming secondary legislation, see the AGRINFO webpage [New EU Organic Regulation explained](#). All regulations are available in [EUR-Lex](#). Following the link to the “current consolidated version” is always recommended, if available. The European Commission also provides an overview of all [Legislation for the organics sector](#), with a summary of each legal act.

The Commission also provides [Frequently Asked Questions on Organic Rules](#), clarifying some specific requirements. [EGTOP Reports on organic production](#), by the Expert Group for Technical Advice on Organic Production, provide technical advice for ongoing development of the organic legal framework.

5.2 Other guides, training materials, and resources

Many organisations – including IFOAM Organics Europe, Better Training for Safer Food (BTSF), FiBL, and Anti-fraud Initiative – provide training materials and guides about the EU Organic Regulation and/or specific topics within the Regulation. As in the case of this guide, third-party materials can help to better understand what is expected. However, organic certification in countries outside the EU is based on the EU legal texts, and the CB’s assessment of compliance based on its approved policies and procedures.

A selection of materials that may be helpful for operators and groups of operators in non-EU countries is listed below.

Training materials, guides, and other relevant third-party information on the EU organic rules

AGRINFO: [New EU Organic Regulation explained](#) (2023)

For up-to-date news and explanations of recent changes, [Search the AGRINFO website](#) by selecting the topic “Organic production”.

FiBL: [Training Handbook: The New EU Organic Regulation \(2018/848\) for Producer Groups](#) (2024)

Naturland: [ICS Manual and Infosheet](#), updated (2025) to cover the EU Organic Regulation. Available in English/French/Spanish.

Gesellschaft für Ressourcenschutz (GfRS): A [Vade Mecum on Official Investigations in Organic Products](#) (2024). Report on common contaminants, laboratory analysis, potential sources and pathways of contamination, and official investigation in organic products according to the new EU Regulation.

The following resources can be helpful for organic exporters to understand the requirements for exporting to the EU and/or different organic markets within and outside Europe.

Information on the organic market and other requirements for exporting to Europe

COLEAD:

- [E-learning platform](#): provides training and courses on food safety and sustainability for the agri-food sector in African, Caribbean, and Pacific (ACP) countries, including regulations on sustainable production and export to Europe (with a special focus on horticulture).
- [Market Insights Dashboards](#): including imports of organic products.

Examples of training courses and resources in organic production in non-EU countries

FiBL:

- [Downloads & Shop](#): free technical guides, training handbooks, and fact sheets on organic farming. Filter on e.g. “international”, or search for specific topics.
- [Organic Africa Platform and Training Manual](#): resources for training on agro-ecological and organic farming in Africa.

Naturland:

- [Naturland Academy](#): free e-learning course and resources on a wide range of topics for Naturland members and other organic operators.



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