



Advancing organic agriculture through certification, education, advocacy, and promotion.

TRACES Certificate of Inspection (COI) Request

All organic products exported to the European Union or Switzerland must be accompanied by an official Certificate of Inspection (COI). A COI is a transaction document that shows the shipment is compliant with the organic regulations. Once CCOF has confirmed your product's compliance with the terms of the EU or Swiss equivalency arrangements, you can request a Certificate of Inspection using the EU Trade Control and Expert System online platform <u>TRACES</u> and selecting CCOF as your recognized certification body.

ALERT: Shipments will be REJECTED if they leave port without an authorized COI

Avoid Shipment Rejections: Timing of the Certificate of Inspection (COI)ⁱ

You must have an authorized COI issued by CCOF prior to shipment leaving the port. You must submit a request in TRACES, upload the Commercial Invoice or Packing List to the COI in TRACES, and provide the shipment date in the supporting documents or in an email to export@ccof.org. Complete requests must be received by CCOF at least 2 business days prior to the shipment departure for CCOF to have enough time issue the COI. Shipments are REJECTED by the EU or Swiss port authorities if the shipment leaves the port before CCOF issues the authorized COI. You are responsible for submitting complete requests to CCOF with enough time for review before departure. After the shipment leaves port, the COI cannot be authorized.

The date when the COI was authorized cannot be modified. You can, however, request other shipment information to be modified to match the final shipment records, including border control post/point of release for free circulation, number of packages, total gross weight, container number, seal number, means of transport, and additional supporting documents. Email <u>export@ccof.org</u> to request modifications.

The CCOF office hours are 9-5 PST. CCOF is closed evenings, weekends, and holidays. Requests for COIs must be submitted at least 2 business days prior to closures.

Compliance with the EU and Swiss Equivalences[®]

Before you submit your COI request, ensure that your products are compliant with the EU or Swiss equivalence arrangements.

- Review your CCOF Client Profile Addendum in <u>MyCCOF</u> and ensure that the product is certified and has been approved for EU or Swiss export under the Global Market Access program. When submitting new products for export, be sure to indicate the export market on the <u>Product Application</u>, <u>H2.6 Broker Suppliers</u>, or <u>V2.1 Wine and Label Approval</u> so that the product is reviewed to this standard.
- 2. Confirm that production or final processingⁱⁱⁱ occurs in the US or Canada.
- Confirm that the product label is compliant for the EU. Retail labels must show the certifier EU control number, see the
 <u>International Labeling Guide</u> for more information. When submitting new labels for review, be sure to indicate the export market
 so that the label is reviewed to this standard.

How to create a TRACES Operator Profile

Once your operation is enrolled in CCOF's <u>Global Market Access (GMA)</u> program for the EU or Switzerland, email the CCOF export team at <u>export@ccof.org</u> to request registration of your operation in TRACES. CCOF's export team will notify you when an Operator profile has been created.

How to sign in to TRACES

Follow the steps found in TRACES <u>Request access</u>. Users can create their own accounts that are then linked to their operation's Operator profile. Users create their own TRACES account and request a User role. CCOF or previously approved Users at the same operation can approve the new User request.





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How to create a Certificate of Inspection request in TRACES

Detailed instructions on completing the COI can be found in the <u>COI User Guide</u>. Only the exporter can create and submit COI documents. Each shipment must be accompanied by a COI specific to that transaction. Consult your importer and the <u>European</u> Commission for guidance with EU tariff codes under the Combined Nomenclature (CN) system.

- 1. Login to <u>TRACES</u> and create a Draft COI.
- 2. Complete the required information and Box 24 (First Consignee) as described in the COI User Guide.
 - a. List product name exactly as it appears on your CCOF Client Profile. If an update is needed to your CCOF Client Profile, email inbox@ccof.org.
- 3. Upload at least one of the following Supporting Documents to the COI to confirm product traceability and identify the product as organic:
 - a. Commercial Invoice, or
 - b. Packing List
- 4. Provide the estimated shipping date and confirmation that the shipment has not left the country of port by doing one of the following:
 - a. Upload Booking Confirmation to the COI, or
 - b. Upload Draft Air/Sea Waybill to the COI, or
 - c. If these documents are not available, email export@ccof.org with the COI number and the estimated shipment date.
- 5. Once your DRAFT COI is ready for submission to CCOF, select Submit for Certification.
- 6. If you need to attach additional supporting documents after the COI request has been submitted, email them to <u>export@ccof.org</u>.

TRACES generates a unique COI Reference Number which is used for tracking the product through the entire supply chain. The COI is electronic only and accessible by the EU authorities, relevant Control Bodies (certifiers) and Operators listed on COI.

Stages of a COI

Draft – Draft COIs are not visible to CCOF. The exporter can modify the COI, CCOF cannot.

Description Complete – Once you select "Submit for Certification", the exporter is not able to make modifications in TRACES but may email <u>export@ccof.org</u> to request modifications.

Issuing Body Declaration Signed– CCOF has signed and issued the authorized COI. The exporter is not able to modify the COI in TRACES but may email <u>export@ccof.org</u> to request modifications.

CCOF can modify the following fields:

- Border control post/Point of release for free circulation
- Number of Packages
- Total gross weight
- Container number, Seal number
- Means of Transport
- Additional supporting documents

The importer can modify the following fields:

- Border control post
- Responsible for the load
- Prior notification
- Special customs procedures
- First consignee

Endorsement – The border control agents in the EU or Switzerland will review the COI and determine whether the shipment can be released as organic





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Resources

USDA: <u>US/EU Equivalence</u>, <u>US/Swiss Equivalence</u> CFIA: <u>EU-Canada Organic Equivalency Arrangement</u>, <u>Canada-Switzerland Organic Equivalency Recognition</u> EU: <u>TRACES</u>, <u>COI User Guide</u>, <u>Combined Nomenclature (CN Codes)</u> CCOF: <u>EU, UK</u>, <u>Switzerland</u>

ⁱ EU regulation 2021/2306

For COR products, production or final processing must occur in Canada. As per the COR/EU and COR/Swiss equivalency arrangements, final processing is defined by the EU regulations (EC) No 852/2004 Article 2(1) as follows:

(m) 'processing' means any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes

(n) 'unprocessed products' means foodstuffs that have not undergone processing, and includes products that have been divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen or thawed
 (o) 'processed products' means foodstuffs resulting from the processing of unprocessed products. These products may contain ingredients that are necessary for their manufacture or to give them specific characteristics.

Products that are not compliant with the third country equivalence arrangements must seek direct compliance with the EU regulations under (EU) 2018/848 Article 46.

ⁱⁱ US/EU Equivalence, US/Swiss Equivalence, European Union-Canada Organic Equivalency Arrangement, Canada-Switzerland Organic Equivalency Recognition, (EU) 2018/848 Article 48, (EU) 2018/848 Article 46

ⁱⁱⁱ Final processing of products must be described on the COI with CN codes per the EU tariff codes under the Combined Nomenclature (CN) system. Consult your importer and the <u>European Commission</u> for guidance with CN Codes. For NOP products, production or final processing must occur in the United States. As per the US/EU and US/Swiss equivalence arrangements, final processing is defined by the NOP regulations <u>NOP 205.2</u> as follows: *Processing: Cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container.*