

ACO – BIOCERT Procedure – Operator Notification

Additional Control of High-Risk Products – Exported from China to EU in 2025

According to the EU release of Ref. Ares (2024) 8617864 Guidance document issued on 3rd December 2024, from 1st January 2025 to 31st December 2025 additional control measures must be applied exclusively to the high-risk products listed in Table 1 (below) exported to the EU from China. Operators certified in China to the EU organic standard under an ACO Certification Agreement must agree to the additional control measures applied to their certified operations as an addition to their certification agreement.

ACO Certification Ltd must implement additional control measures for the defined CN codes (listed in Table 1 below):

- Testing control of COI related consignments, and
- Additional onsite inspections, and
- Additional annual sampling, and
- Traceability

These control measures are without prejudice – **therefore additional** – to the basic obligations to carry out a minimum percentage of additional controls and take a minimum number of samples based on a risk assessment. This means that from 1st January 2025 until 31st December 2025⁽¹⁾, the additional control measures must be applied exclusively to:

- the following products and
- the operators producing, preparing, trading, storing, or exporting⁽²⁾ the CN code products

⁽¹⁾ Note that the European Commission reassesses risks and the list of countries and products affected may vary after reassessment.

⁽²⁾ Exporters who are not amending or processing the product or packaging need to comply to this additional requirement.

When applying with ACO as an operator who produces, prepares, trades, stores, or exports these products, you agree to these additional high-risk CN control measures. If additional control measures do not meet the requirements of the organic compliance of a product, you understand that:

- COIs may not to be approved.
- Nonconformance and Corrective Action may be enforced on the whole of the operation.

Table 1

CN Code	Products	Minimum sampling percentages for all exports under ACO for each product category
0910 11 00 2006 00 10	Ginger	10%
1202 42 00	Peanuts	10%
*ex1207 99 96 ex1209 91 80 ex1212 99 95	Pumpkin seeds	10%
2304 00 00	Soy	10%
0902 10 00 0902 20 00 0902 40 00	Tea	20%

*: Where only certain products under any CN code are required to be examined, the CN code is marked as 'ex'.

Period of control measures

The implementation of the control procedure is valid from 1st January 2025 until 31st December 2025.

Scope of control measures

The control measures must be applied to the following identified products from China. Goods from China through a third country to the EU should also comply with these guidelines.

Control Measures

1. Testing control of COI related consignments

Samples must be taken by ACO representatives prior to COI approval. COI of high-risk products may not be approved if no successful sample result is processed by ACO.

To allow testing and test results prior to COI approval and shipment, ACO requests the exporting high-risk clients to submit COI request **3 weeks** prior to shipment date to ensure test results can be assessed for COI approval. After ACO receives a COI request, ACO will notify via email if a test must be taken for COI approval. ACO will send a representative to take a sample of the consignment for export and submit it for testing at an approved laboratory.

After ACO receives the test result, the results will be assessed:

- Negative/ nil detection: COI may be approved.
- Positive detection: investigation and noncompliance process will be required. COI may not be approved.

2. Additional Onsite inspection

Products related to the above additional monitoring requirements, regardless of the farm, processing plant or traders, need to undergo two annual on-site inspections, comprised of:

- One annual inspection.
- One unannounced inspection.
- One of the two inspections must be conducted during the crop growing period.
- The first year of certification requires the first inspection before the cultivation activities.

3. Additional annual sampling

For Farm operations, one sample must be taken annually during one of the two inspections. An annual sample of high-risk raw material, intermediate product **or** processed product should be taken during one of the two inspections.

4. Traceability

Operators under CN codes must provide clear and detailed traceability, including:

- quantities harvested and/or prepared.
- means of storage and transport of the goods.
- including the possible application of non-authorized substances at these stages.
- destination of all the products harvested and/or prepared at the farm regardless of whether these crops are sold as organic or not or are exported or not.
- Quantities and the names of the buyers.

During Audits of High-risk Product operations, ACO-BIOCERT will include a systematic audit record from production and processing quantity, storage, and transportation, including the prohibited substances that may be used at these stages, financial documents, from the farm to the end customer, including the quantity and sale path.

Fees

To cover the extra cost of these control measures as described above, related Fees will be charged, including but not limited to, unannounced inspection fee, sampling fee, laboratory testing fee, and additional inspection fee for complaint handling if applicable.