

Additional Control of High-Risk Products Exported from China to EU in 2026

Each year, the EU Commission publishes a list of high-risk products that must be subject to additional controls by the organic certification body.

As of the date of this notice, the EU Commission has not yet published the list of high-risk products for 2026. Until the new list is published, ACO will continue to apply the 2025 high-risk products list in 2026.

The 2025 high risk-products list included the following products originating from China:

Table 1: EU high-risk products originating from China

Product	CN code(s)	Percentage of consignments subject to checks and sampling
Ginger	0910 11 00 2006 00 10	10%
Peanuts	1202 42 00	10%
Pumpkin seeds	ex1207 99 96 ex1209 91 80 ex1212 99 95	10%
Soy	2304 00 00	10%
Tea	0902 10 00 0902 20 00 0902 40 00	20%

In 2026, operators that produce, prepare, trade, store or export one or more of the products listed in Table 1 shall be subject to the additional controls outlined below.

1. Two onsite audits

ACO shall conduct at least two onsite audits, one of which will be an unannounced audit. This requirement applies to the calendar year. Operators that apply for certification and undergo an initial audit in the final quarter of 2026 are advised that they will still be subject to a second unannounced audit before the end of the year. ACO may delay granting certification until the beginning of 2027 if it will not be possible to complete the required second audit before the end of 2026.

2. Product sampling

ACO will take at least one sample of each high-risk product type to be tested for the presence of non-authorised substances. These samples will be taken from crops in the field. For operators not growing crops, a relevant sample of incoming raw material, intermediate product, or processed product will be taken instead.

3. Additional checks prior to issuing Certificates of Inspections

For exports of high-risk products to the EU, ACO will perform additional physical checks and sampling of consignments prior to issuing the Certificate of Inspection (COI), according to the percentages defined in Table 1. Operators exporting high-risk products are requested to submit COI applications at least **3 weeks** prior to departure date to ensure that test results can be received and assessed by the ACO office prior to issuing the COI. Following COI application, ACO will notify via email if sampling is required. ACO will send a representative to take a sample of the consignment and send it to an approved laboratory for testing.

The COI will be approved if sample test results are negative for the presence of non-authorised substances.

The COI will not be approved if sample test results are positive for the presence of non-authorised substances. In this situation, ACO will commence an investigation to determine the reason for the presence of the non-authorised substances. Fees for investigations will be charged according to the ACO Fee Schedule.