

# **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 are REJECTED if they leave port of departure without an authorized COI

## Avoid Shipment Rejections: Timing of the Certificate of Inspection (COI)<sup>i</sup>

You must have an authorized COI issued by CCOF prior to shipment leaving the port of departure. Shipments departed prior to authorization are REJECTED. To be successful, submit a request for COI in TRACES at least 5 business days prior to shipment. Ensure the request includes matching shipment records. Any requests to modify supporting records after the COI authorization must be emailed to export@ccof.org

CCOF offers a Same-Day and Two-Business-Day Rush service. If you need rush service email <a href="mailto:exports@ccof.org">exports@ccof.org</a> and include RUSH in the subject line and note the desired timeline in the body of the email. Additional Rush service fees apply per the <a href="mailto:certification Services">certification Services</a> Program Manual. For Same Day Rush, requests must be submitted by noon PT. For Two Business Day, requests must be submitted by 5pm PT.

The CCOF office hours are 9-5 PT. CCOF is closed evenings, weekends, and holidays.

### 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 processing<sup>iii</sup> 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 you are 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 notifies you when an Operator profile has been created.

## How to sign in to TRACES

Follow the steps found in TRACES <u>Request access</u>. You are responsible for creating your own account that is then linked to your Operator profile. Create your 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>TRACES COI User Guide</u>. Only the exporter can create and submit COI records. Each shipment must be accompanied by a COI specific to that transaction. Consult your importer and the <u>European Commission</u> for guidance with EU tariff codes under the Combined Nomenclature (CN) system.

- 1. Log in to <u>TRACES</u> and create a Draft COI.
- 2. Complete the required information as described in the <u>COI User Guide</u>.
  - a. List product name exactly as it appears on your CCOF Client Profile. If an update is needed to your CCOF Client Profile, email <a href="mailto:inbox@ccof.org">inbox@ccof.org</a>.
  - b. Include Lot # in Box 13.
  - c. Include First Consignee in Box 24.
- 3. Upload at least one of the following Supporting Records to the COI to identify the product as organic and confirm product traceability through lot number(s) and weight(s) in kilograms (kg).
  - a. Commercial Invoice, or
  - b. Packing List
- 4. Provide the shipping date from the port of departure. The shipping date must reflect that the authorization for a COI is prior to departure date. Other records to confirm shipping date include:
  - a. Booking/Shipping Confirmation, or
  - b. Draft Air/Sea Waybill, or
  - c. Dock Receipt
- 5. Once your DRAFT COI is ready for submission to CCOF, select Submit for Certification.
- 6. Email export@ccof.org
  - a. Notify the CCOF Export team your COI has been submitted in TRACES by emailing <a href="mailto:export@ccof.org">export@ccof.org</a> with the COI number as your subject line.
  - b. If you need a Same-Day or Two-Business-Day rush review, include RUSH in the subject line and note the desired timeline in the body of the email. Additional Rush service fees apply per the <u>Certification Services Program Manual</u>. For Same Day Rush, requests must be submitted by noon PT. For Two Business Day, requests must be submitted by 5pm PT.
- 7. After CCOF approval, you may request modifications to shipment information to match the final shipment records, including border control post/point of release for free circulation, number of packages, total gross weight in kilograms (kg), container number, seal number, means of transport, and additional supporting records.
- 8. If you need to attach additional supporting records or provide required finalized shipping records after the COI request has been submitted, email the COI number and records to <a href="mailto:export@ccof.org">export@ccof.org</a>.

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.

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# 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 cannot 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 cannot modify the COI in TRACES but may email <a href="mailto:export@ccof.org">export@ccof.org</a> to request modifications.

CCOF can modify the following fields:

- Border control post/Point of release for free circulation
- Number of Packages
- Total gross weight in kilograms (kg)
- Container number, Seal number
- Means of Transport
- Additional supporting records

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 review the COI and determine whether the shipment can be released as organic.

#### 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</u>, <u>UK</u>, <u>Switzerland</u>

#### EU regulation 2021/2306

<sup>ii</sup> 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

<sup>iii</sup> 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.* 

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.







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