

For importers: New method for handling organic import controls from 1 March 2025

From 1 March 2025, the control system for all organic import consignments covered by the regulation on organic products will change. At this time, Skal Biocontrole will completely take over from the Customs Administration when it comes to checking the organic status of consignments. The order of the checks will also change: from 1 March 2025, the control process in the Netherlands will start with a verification of the COI by Skal.

The changes to the control process are necessary to align with EU laws and regulations.

The new method: step by step

1. In box 20 of the COI, the importer indicates the expected date of arrival at the border control post (BCP) or at the point of release for free circulation. This must be filled in no later than 24 hours before expected arrival and, in the case of consignments with logistical constraints, no later than 4 hours before expected arrival. (Logistical constraints apply in case of air freight and consignments from the United Kingdom.)
2. The expiry of the date and time in box 20 of the COI indicates to Skal that the COI can be verified.
3. Skal verifies the COI and accompanying documents. Skal applies a lead time of 4 hours after the date and time in box 20 in case of consignments without logistical restrictions and 1 hour in case of logistical restrictions.
4. If the COI is not complete or Skal finds irregularities in the COI or accompanying documents (such as the final transport document, packing list and invoice), the importer will be contacted.
5. If Skal finds irregularities in the COI, accompanying documents and/or if Skal also performs an identity check or takes a sample, longer lead times apply.
6. It is no longer possible to alter the COI once it has been verified in box 30 by Skal.
7. For organic consignments that are also checked by the Netherlands Food and Consumer Product Safety Authority (NVWA)/Quality Control Bureau (KCB), the advance declaration to the NVWA via the CLIENT or VGC system must state that it concerns an organic consignment. To this end, please include the document code C644 and the COI number.
8. Any other checks by KCB and NVWA. The checks performed by KCB can take place at the same time as the checks performed by Skal. However, the CHED will only be issued *after* the COI is verified.
9. Release for free circulation by Customs. Customs can only release the organic consignments as such once a COI verified by Skal has appeared in TRACES. Upon the release for free circulation, please state the document code C644 and the COI number. This way, Customs will know it concerns an organic consignment.

Customs checks whether the COI was verified by Skal; this is a condition for releasing the consignment.

What consequences does this new method have for importers or their representatives?

- The duration of the entire process from arrival of consignment to release for free circulation is expected to remain the same. What will change, however, is the lead time per step.
- For a smooth control process, it is important that you submit the COI in TRACES in a timely, correct and complete manner, including attachments (final transport document, packing list and invoice).
- In case of consignments without logistical constraints, box 20 must ultimately be completed correctly at least 24 hours prior to arrival. If there are any logistical constraints, this period is reduced to 4 hours.
- You must ensure that the consignment is present at the border control post or point of release at the time indicated in box 20 and that the consignment is available for inspection, given that the intention is to import the consignment into the Union. If a consignment goes into storage (customs warehouse), box 20 must not be filled yet, but box 23 does.
- After the COI is verified by Skal, you cannot modify it anymore. One of the consequences of this is that you can no longer alter box 24, meaning the consignment cannot be divided into extracts. The first consignee can no longer be altered either.

The COI can only be divided with retroactive effect if irregularities are found during the KCB checks that require the consignment to be divided. This is only possible if there are irregularities where part of the consignment can be released for free circulation and part of the consignment cannot. In this case, KCB informs Skal, after which Skal will have to verify the conclusion of the COI and submit a request to this effect to the European Commission (DG Agri).

- Any samples are taken by Skal prior to the verify of the COI. The analysis results of a sample are uploaded in TRACES.
- When making a customs declaration for free circulation, it is mandatory to indicate which documents are associated with this customs declaration. Please use document code C644 to indicate that the consignment is organic *and* that the COI has been verified in box 30. It is important that you correctly enter the COI number to ensure that your customs declaration is accepted.

This new method has administrative consequences; it is important you adapt your own manner of operation accordingly to avoid delays in the logistics process. You are therefore advised to share this information with any of your service providers in the chain for whom it is relevant.

Questions?

In the months ahead, we will regularly inform importers of the new method.

If you have any questions, please contact the Skal helpdesk:

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