

CUSTOMER INFORMATION 25-02

AUGUST 2025

IMPORTANT COMPLIANCE REMINDER REGARDING ORGANIC REGULATION EU 2018/848 (BASIC ACT AND DELEGATED AND IMPLEMENTING ACTS)



Dear valued customer,

We hope this message finds you well. As part of our ongoing commitment to ensuring full compliance with EU organic regulations, we would like to remind you of several key obligations and definitions relevant to your certification with Kiwa BCS.

1 ACCURACY OF YOUR ORGANIC SYSTEM PLAN (OSP) AND MAPS

We kindly remind you, as an operator¹, to ensure that your **Organic System Plan (OSP), including all maps and sketches, is complete, precise, and kept up to date.** These documents are essential for the effective control and verification of your organic operations.

Any **modification or update** to your OSP must be **communicated to Kiwa BCS without delay!**

If your operation includes multiple production units² or **premises**, such as **purchase or collection centres**, please note that **all units—whether used for organic, in-conversion, or non-organic activities—must be included in your OSP.** This ensures full transparency and compliance with control requirements.

In cases where your holding³ includes **non-organic or in-conversion production units**, we are required to verify:

- The **records** you maintain for each unit.

DEFINITIONS taken from EU Reg. 2018/848 Art. 3:

¹ **'operator'** means the natural or legal person responsible for ensuring that this Regulation is complied with at every stage of production, preparation and distribution that are under that person's control;

² **'production unit'** means all assets of a holding, such as primary production premises, land parcels, pasturages, open air areas, livestock buildings or parts thereof, hives, fish ponds, containment systems and sites for algae or aquaculture animals, rearing units, shore or seabed concessions, and premises for the storage of crops, of crop products, of algae products, of animal products, of raw materials and of any other relevant inputs managed as described in organic production unit; in-conversion unit; non-organic production unit.

'organic production unit' means a production unit, excluding during the conversion period referred to in Article 10, which is managed in compliance with the requirements applicable to organic production;

'in-conversion production unit' means a production unit, during the conversion period referred to in Article 10, which is managed in compliance with the requirements applicable to organic production; it may be constituted of land parcels or other assets for which the conversion period referred to in Article 10 starts at different moments in time;

'non-organic production unit' means a production unit which is not managed in compliance with the requirements applicable to organic production;

³ **'holding'** means all the production units operated under single management for the purpose of producing live or unprocessed agricultural products, including products originating from aquaculture and beekeeping, referred to in point (a) of Article 2(1) or products listed in Annex I other than essential oils and yeast;

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- The **measures, procedures, or arrangements** you have implemented to ensure **clear and effective separation** between organic, in-conversion, and non-organic production units.
- The **separation of substances and products** used in each type of production.

Our inspections will also include:

- **Verification of parcels** that have been retroactively recognized as part of the conversion period.
- **Checks on non-organic production units** to ensure compliance with separation and traceability requirements.

Furthermore, if **organic, in-conversion, and non-organic products are collected, prepared, stored, or transported simultaneously** within your operation, we must verify that:

- Activities are **separated by place or time**.
- **Cleaning measures** are implemented to prevent contamination or substitution.
- Products are **clearly identified at all times**.
- Storage before and after preparation is **separated by place or time**.
- **Traceability** is ensured from each land parcel to the collection centre.

These requirements are clearly outlined in **Article 9. 1. (b), (c), and (9)** of Reg. (EU) 2021/1698

2 ACCESS FOR CONTROL PURPOSES

As stipulated in the Declaration signed under Compliance, we remind you that:

“Kiwa BCS, as your control body, must have access to all parts of all production units and all premises for control purposes.”

This access is a fundamental requirement for maintaining the integrity of your organic certification and ensuring full compliance with EU regulations.

As previously mentioned, during inspections we are required to verify the **measures and procedures you have implemented**, including—where applicable—those related to **non-organic production units** within your operation.

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In the event of **non-compliance**, Kiwa BCS is obligated to take all necessary actions to:

- **Determine the origin, extent, and responsibility** for the non-compliance.
- **Ensure appropriate corrective measures** are taken by your operation.
- **Prevent recurrence** of the non-compliance through effective follow-up and monitoring.

These steps are essential to uphold the credibility of organic certification and to protect the trust placed in your products by consumers and the market.

We thank you for your continued dedication to organic integrity and your cooperation with Kiwa BCS. Your commitment plays a vital role in maintaining the trust and transparency that define organic certification. Should you have any questions or require support, our team is always here to assist you

Kind regards,

Kiwa BCS Öko-Garantie GmbH



i. V. Karlo Zeljko
-Head of Team Operations international-



i. V. Ronald Wesner
-Technical Management-

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If you have any queries or general questions about the control procedures, we will be happy to help you during our office hours by telephone (+49 911 42439 - EXT) or all day by e-mail.

On our website you will find the current versions of relevant documents, in particular for the preparation of the inspection.

- <https://www.kiwa.com/de/en/downloads-kiwa-bcs/important-documents-for-your-organic-certification/>

Office hours (Central European Time)

Monday to Thursday: 9:00 am to 3:00 pm

Friday: 9:00 am to 2:00 pm

Service: OSP updates, company name/ address change/ tour-planning/ submission of documents for correction of NCF (non-conformities)



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Contact

- Beate Erlbeck (EXT -33)
- Roxana Cruz (EXT -68)

Quotations, additional certification services, contracts



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Contact

- Oliver Altwasser (EXT -37)
- Kristina Grocholl (EXT -76)

Request / creation of import control certificates (COI), transaction certificates (TC)



de.tc.in.bcs@kiwa.com



Contact

Applications Germany, Eastern Europe and Africa

- Tobias Süß (EXT -53) Deputy: Claudia Valencia (EXT -54)

Applications Asia, Saudi Arabia

- Claudia Valencia (EXT-54) Deputy: Tobias Süß (EXT -53)

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Applications China and Turkey

Applications Germany, Eastern Europe and Africa

- Tobias Süß (EXT -53) Deputy: Claudia Valencia (EXT -54)

Applications Asia, Saudi Arabia

- Claudia Valencia (EXT-54) Deputy: Tobias Süß (EXT -53)

Applications China and Turkey

- Marco Hafner (EXT -55) Deputy: Claudia Valencia (EXT -54)

Invoicing

For questions about your invoice



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Contact

- Dimitri Regel (EXT -63)

Residues cases



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Contact

- Marlene Radolf (EXT -29)
- Natalia Redam (EXT -49)

Head of Team Operations International 49702 & 49703

Coordination of control implementation, certification, technical support of control procedures



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Contact

- Karlo Zeljko (EXT -62)

Technical Management



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Contact

- Ronald Wesner (EXT -14)

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General Management



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Contact

- Ivonne Wimmer (EXT -10)