To all UK importers of organic products

Cc – UK Organic Certification Bodies and Port Health Authorities

Date 18 December 2006

Dear all,

IMPORTANT: INFORMATION EFFECTING THE IMPORT OF ORGANIC PRODUCTS INTO 2007 AND BEYOND

I am writing to inform you of the future of organic imports going into 2007.

As you may know, the system of organic imports that has operated for many years is due to come to an end on 31 December 2006, to be replaced by an alternative regime. This is to involve lists of approved Third Countries and inspection/certification bodies working in third countries, and is outlined in greater detail later in this letter. It will take a while for these lists to be formulated, therefore, the import regime that currently operates will continue until at least mid 2007.

Into 2007

Usual system with automatic annual renewals

Going into 2007, the requirement to be authorised to import organic products will remain in place. New applications and requests to amend existing import authorisations (variations) will be treated in the normal way. Please ensure that you tell us if any alterations need to be made to your authorisation, you should not wait until you apply for annual renewal to do this. Annual renewals will be processed differently in 2007;

From 1 January 2007 all expiring import authorisations will be automatically re-issued for another year. We have taken this decision to reduce the administrative burden on importers, but also because we do not want to delay the reissuing of authorisations due to the increased number of renewal applications we could potentially receive over the coming 2-3 months.

Importers whose authorisations are to expire in 2007 will receive an automatic annual renewal and be automatically charged £20, therefore, it is very important that you inform...
us if you do not wish to continue importing beyond the date of expiry of your existing
authorisation. We will not be able to issue refunds if you fail to do this.

As a form of quality control, we will be assessing a sample of supply chains before issuing
these automatic extensions. Therefore, you may be required to provide documents
(certificates, statements, etc.) to support your supply chain. Please note that
authorisations that expire between now and 31 December 2006 will require a renewal
application (OB8b).

The new regime

As has been mentioned, the system of issuing authorisations for the import of organic
products was to finish on 31 December 2006, with the new regime taking effect from 1
January 2007. However, the replacement system is not fully formulated and so will be
implemented at some point over the coming year.

The intention in altering the way organic imports are handled is to reduce the
administrative and economic burden on EC importers. Currently, the organic import
system requires imported products to be either from an equivalent country or that the EC
importer be authorised for their import. The requirement to be authorised will be withdrawn
and organic imports will fall into one of the three categories, outlined here:-

<table>
<thead>
<tr>
<th>Title</th>
<th>Can be imported if..</th>
<th>Action by EC Commission/Defra</th>
<th>At UK Ports</th>
</tr>
</thead>
</table>
| Direct Access       | …import is of totally compliant products guaranteed by approved organic inspection / certification bodies applying standards fully compliant with EC organic Regulation and each accredited to EN45011 or ISO65 | A list of recognised organic inspection / certification bodies applying standards fully compliant with EC organic Regulation is drawn up by the European Commission | If import involves fully compliant CB from list the Port Health Authority will allow product in.  
A Certificate of Inspection is not required to be presented to the port, but it is likely that the certificate of the final certified operator in the third country will need to be presented instead |
| Equivalent Countries| …country of origin is on list of equivalent countries                                  | A list of third countries drawn up and made available to Port Health Authorities (current list will almost certainly operate) | If import is from equivalent country Port Health Authority will allow product in.  
A Certificate of Inspection (or updated version of) must be presented to the port |
| Equivalent Operators| …import is of product controlled by recognised organic inspection / certification bodies applying equivalent standards | A list of recognised third country organic inspection / certification bodies is drawn up | If import involves a recognised inspection / certification body from the list the Port Health Authority will allow product in.  
A Certificate of Inspection (or updated version of) must be presented to the port |
We will flesh out some of the finer points of these requirements as we get nearer to full implementation, but broadly this is the way we expect the new system to operate.

Certificates of Inspection issues, now and in the future

The requirement for a UK based organic importer to present a Certificate of Inspection to the Port Health Authority will remain in place. As you have seen, this is also expected to apply under the new regime in many cases.

We would like to take this opportunity to remind importers that the onus is on you to present correct Certificates of Inspection to Port Health Authorities. Port Health Authorities are not to be asked to make changes to Certificates if it is found to be incorrect after presentation. The details on the Certificate of Inspection must match up to those on your import authorisation.

Importers must keep original, endorsed Certificates of Inspection for a minimum of 2 years. The documents must be presented to your Certification Body at each annual audit. Any temporarily endorsed copies used to get products through airports will not be acceptable. You must make sure that the original presented to, and endorsed by, the Port Health Authority is made available at the audit.

Under the new regime, to take effect at some point in 2007, the procedure at ports for checking Certificates of Inspection will alter, as described in the table above. We assume that there will continue to be a charge for this work. We will keep you informed of developments on this.

If you have any questions please do not hesitate to contact us.

Yours sincerely

Anthony Wallis

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