

# GDSN Implementation Guideline for Organic Products in Europe

How to use GDSN to exchange information commonly required by retailers and by EU Regulation 2018/848 for Organic Products.

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## Contributors

Name	Organisation

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## 1 Introduction

In accordance with Article 1 of Regulation (EU) 2018/848 on organic production and labelling of organic products, any undertaking which produces, processes, stores, or imports organic products from a third country in order to subsequently market them, or which markets these products, is obliged to comply with the control procedure laid down in the Regulation.

This means that the respective company must be certified by an organic control body. When goods are received, it must be checked in accordance with the EU Organic Regulation whether the respective supplier is subject to the control procedure in accordance with the Organic Regulation. For this reason, the code of the control authority or control body responsible for the undertaking, which carried out the last processing operation, must be indicated. In this respect, in the case of prepackages/packages, the control body of the packer.

The code number is noted on the respective organic certificate or can be requested from the organic control body. The current list of all approved organic control bodies is published in the Official Journal of the EU in irregular intervals.

Unless otherwise stated, the same specifications also apply to Switzerland for its Swiss Organic Farming Ordinance of 22 September 1997 (SR 910.18). To improve the reading of this guideline, the document does not always refer to the analogous applicability for Switzerland.

GS1 standards, services and solutions can help companies to comply with requirements concerning communication of product data that is required to comply with requirements of the regulation towards trading partners.

This document aims at providing a harmonized way of using GDSN to exchange all required information to comply with the regulation between trading partners. The objective here is to specify the data to be exchanged between data pools. Each Data pool is responsible for mapping the right message.

This guidance is a technical document and is not intended to provide any legal interpretation of the Regulation (EU) 2018/848, the ultimate official interpretation of which is the exclusive reserve of the judicial powers, i.e. the national courts and the Court of Justice of the European Communities.

## 2 The mandatory particulars

The following product data must be exchanged - either as general mandatory labelling requirements, as specific mandatory labelling requirements dependent on the type of product, or for the purpose of data exchange to identify organic and in-conversion goods - for products bearing terms as referred to in Article 30(1), including products labelled as in-conversion products in accordance with Article 30(3), when being compliant with Regulation (EU) 2018/848:

- the code number of the control authority or control body,
- the organic production logo of the European Union (mainly for pre-packed food, with the exceptions specified in the regulation).

When the organic production logo of the European Union is used, it must be indicated where the agricultural raw materials of which the product is composed have been farmed. This can be done by one of following statements:

- (a) '**EU Agriculture**' – the agricultural raw material has been farmed in the Union.
- (b) '**non-EU Agriculture**' – the agricultural raw material has been farmed in third countries.
- (c) '**EU/non-EU Agriculture**' – a part of the agricultural raw materials has been farmed in the Union and a part of it has been farmed in a third country.
- (d) '**The name of the country**' – only if all the agricultural raw materials of which the product is composed have been farmed in one country, words 'EU' and 'non-EU' may be replaced or supplemented by the name of the country.

### 3 Attributes – minimum requirements

This chapter provides description of GDSN attributes used to exchange basic labelling data for organic products inside European countries. Additional specific information may be used at the local level.

If some particulars do not apply to some products, corresponding attributes should not be populated.

Table below provides brief overview of all attributes in this chapter. More details about every attribute are provided in following sub-chapters.

BMS ID	GDD attribute name	Usage in context of organic products
1248	organicTradeItemCode	To indicate if the product is organic.
2312	packagingMarkedLabelAccreditationCode	To indicate presence of European organic logo (Euroleaf).
5879	organicCertificationIdentification	To provide code number of the control authority/body displayed near European organic logo, e.g. FR-BIO-15.
1244	organicProductPlaceOfFarmingCode	To indicate origin of the organic product displayed near European organic logo.
2800	countryOfActivity/countryCode	To indicate the particular country where the fresh product or the agricultural raw materials of which the product is composed have been farmed when attribute 1244 equals FARMING_COUNTRY_OF_ORIGIN.
2799	productActivityTypeCode	Qualifier for attribute 2800, should equal FARMING.

#### 3.1 Identification of an organic product

- **BMS ID:** 1248
  - **GDSN name:** organicTradeItemCode
  - **Instruction:** Use one of the following codes to indicate whether product is organic, not organic or partially organic.
    - **GDSN code '2':** Organic in accordance with the regulation in force for the target market and for the product. E.g., in EU for processed food, when at least 95% of the agricultural ingredients of the product by weight are organic; 100% organic for fresh products like fruit and vegetables, meat, fish, eggs, etc. Outside Europe, this code indicates "Organic (at least 95% by weight)".
    - **GDSN code '5':** Non-organic according to the regulation applicable to the target market and product (also known as conventional cultivation).
    - **GDSN code '6':** In conversion from non-organic to organic. The product is **not organic**, but the manufacturer has begun the process of converting to organic. The term ORGANIC must be in accordance with the regulations of the target market. And for certain markets (e.g., EU), local regulations prohibit the use of the ORGANIC label. It authorizes the mention "In organic conversion" to be indicated in the legal sales name of the product concerned and the product can only be considered as ORGANIC from the 2<sup>nd</sup> year after conversion. Any farm that wishes to produce organically must undergo a process known as 'conversion'. During this period, organic production methods need to be used but the resulting product cannot be sold as organic. The length of this conversion period depends on the type of organic product being produced. For EU countries, more details can be found in the specific regulation [https://ec.europa.eu/info/food-farming-fisheries/farming/organic-farming/becoming-organic-farmer\\_en](https://ec.europa.eu/info/food-farming-fisheries/farming/organic-farming/becoming-organic-farmer_en).
- A product that is "in conversion" may in the future be qualified as "organic".
- Additionally, following code is not a minimum requirement but it is used in some markets as well: **GDSN code '3':** Made with organic ingredients. The product is not organic but is composed of at least 70% organic ingredients by weight. The term ORGANIC shall be in

accordance with the regulations of the target market. And for certain markets (e.g., EU), local regulations prohibit the use of the ORGANIC label.

- **Remark:** GDSN standard code list contains more codes. However, only the codes above are recommended for Europe. Please note that **GDSN code '1'** (100% Organic) will be blocked for Europe in GDSN release 3.1.29 in November 2024. Code '2' shall be used instead.
- **Example:** code 2 – Organic

### 3.2 European organic logo

- **BMS ID:** 2312
- **GDSN name:** packagingMarkedLabelAccreditationCode
- **Instruction:** Use code EU\_ORGANIC\_FARMING when the European organic logo (Euroleaf) is present on the product's label.
- **Remark:** The European organic logo (Euroleaf, Annex V of Regulation (EU) 2018/848) must be used for pre-packaged foods with 95% or more organic ingredients. Its use is optional for products imported from third countries not packaged in the EU, or for not pre-packaged products.

This attribute can also be used to share many other logos.

- **Example:** code EU\_ORGANIC\_FARMING representing logo illustrated below.



### 3.3 Organic certification body

- **BMS ID:** 5879
- **GDSN name:** organicCertificationIdentification
- **Instruction:** Provide the code number of the control authority or control body as stated on the label near the European organic logo (Euroleaf). See picture in Example for more details.
- **Remark:** Where a term referring to organic farming is used in the labelling of a food or feed and under the conditions referred to in Article 30(1) of EU Regulation 2018/848, the code number of the control authority or control body to which the operator who carried out the last production or preparation operation, including the physical operation of the label, must appear on the label attached to the product and in the same visual field as the EU organic logo, if the latter is used in the product (article 3.2 of EU Regulation 2021/279).

The labelling of the code number of the certification body is mandatory. It is constructed as follows:

- Acronym of the Member State based on ISO 3166-1 alpha-2
- Reference to organic farming with mention of BIO, ÖKO, EKO, etc. (is country specific)
- Identification number of the certification body

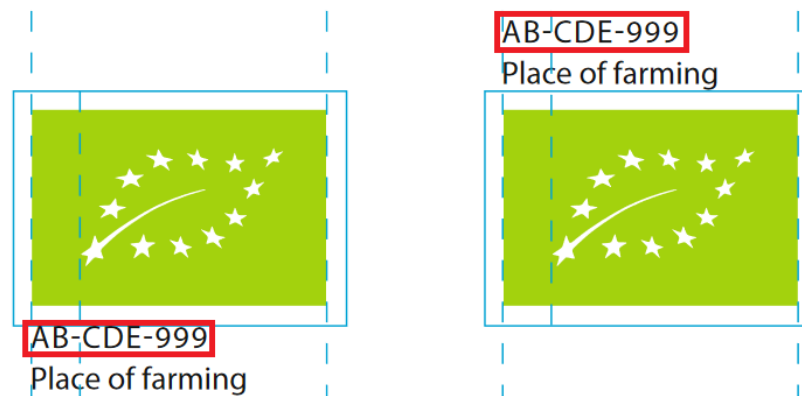
The list of EU inspection bodies and authorities is published on the website:

[https://ec.europa.eu/agriculture/ofis\\_public/actor\\_cbeu/ctrl.cfm?targetUrl=home](https://ec.europa.eu/agriculture/ofis_public/actor_cbeu/ctrl.cfm?targetUrl=home)

The list of inspection bodies and authorities in third countries is published on:

[https://agriculture.ec.europa.eu/farming/organic-farming/trade\\_en](https://agriculture.ec.europa.eu/farming/organic-farming/trade_en)

- **Example:** "FR-BIO-15", "AT-BIO-301"



**AB-CDE-999** (code number of the certifier)

- AB** – ISO code as specified in Article 58(1)(a) for the country where the controls take place
- CDE** – three letters term that establishes a link with the organic production method as specified in Article 58(1)(b) such as "öko", "org", "eko", "bio", etc.
- 999** – reference number, indicated in maximum three digits, to be attributed, as specified in Article 58(1)(c)

### 3.4 Origin of agricultural raw materials

- **BMS ID:** 1244
- **GDSN name:** organicProductPlaceOfFarmingCode
- **Instruction:** Use one of the codes below to indicate origin of organic agricultural raw materials as stated near the European organic logo (Euroleaf) on the product's label. This indication must be in one of the forms mentioned in article 32.2 of Regulation (EU) 2018/848. See picture in Example for more details.
  - GDSN code **'EU\_AGRICULTURE'**: "EU Agriculture" is used when the agricultural raw material has been produced in the EU.
  - GDSN code **'NON\_EU\_AGRICULTURE'**: "Non-EU agriculture" is used when the agricultural raw material has been produced in a third country.
  - GDSN code **'EU\_OR\_NON\_EU\_AGRICULTURE'**: "EU/non-EU agriculture" is used when part of the agricultural raw material was partly produced in the EU and another part in a third country.
  - GDSN code **'FARMING\_COUNTRY\_OF\_ORIGIN'**: Used when the indication "EU" or "non-EU" is replaced by name of a country or name of a region when at least 95 % of agricultural raw materials by weight come from that country. In this case, following GDSN attributes should be used to provide information about such country:
    - productActivityTypeCode (BMS ID 2799) = 'FARMING'
    - productActivityDetails/countryOfActivity/countryCode (BMS ID 2800) = ISO 3166-1 numeric code of the country (three digits), e.g. 250 for France.
- **Remark:** When the European logo is used (Article 32.2 of the EU Regulation 2021/848) the origin of the raw materials of which the product is composed must be indicated. The obligation to indicate the origin in the form of "EU/non-EU agriculture" for products with both EU and non-EU ingredients should not be diverted from its purpose, which is to inform the consumer about the origin of the raw material, and not to allow for a single label for products whose raw material origin may vary. It is therefore not possible to accept labels with the words "EU/non-EU agriculture" for products with only one origin. On the other hand, it may be possible for a processed single-ingredient product to have two different origins (mixture of orange juice from France and orange juice from Morocco as ingredients of one orange juice product). In this case the term "EU/non-EU agriculture" should be used.
- **Example:** EU\_AGRICULTURE



AB-CDE-999  
EU Agriculture



AB-CDE-999  
Non-EU Agriculture



AB-CDE-999  
EU/non-EU Agriculture



AB-CDE-999  
Belgium Agriculture



AB-CDE-999  
Costa Rica Agriculture