



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B. Quality, Research & Innovation, Outreach  
**The Director**

Brussels  
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Dear delegates,

We have received from many of you, concerns about the impact of the COVID 19 crisis on the control system, providing concrete solutions and asking the Commission to come urgently with guidance and, if needed, legal proposals to be voted by written procedure and with possibly a retroactive effect.

We are working on concrete proposals, but some internal work is needed to find the appropriate legal basis for possible derogations to the current regulation.

**I would like to point out some measures already proposed by a number of Member states:**

Regarding the control performed by control bodies both in the EU and in third countries

- all the on-the-spot visits planned during this period shall be postponed after the end of the sanitary emergency;
- organic certificates can be issued with a verification of conformity carried out on the basis of documentary checks and of the risk analysis. The on-the spot visits will be carried out at the end of the sanitary emergency;
- the CBs shall implement a special procedure for the verification of operators during the sanitary emergency, taking into account the specific indications of the Accreditation Body.

Regarding the Certificate of Inspection

The Control Bodies validate the box 18 before the shipment leaves the third countries in TRACES. Member States will be asked to endorse by validating the COI in TRACES in absence of the paper copy signed. The paper copy will be sent as soon it is possible.

Regarding the implementation of the guidelines for additional controls (China, Russia, Kazakhstan, Moldova and Ukraine)

Obligation for CBs to carry out additional visits and systematic physical checks and sampling of all consignment concerned by the Guidelines and additional controls are maintained only if feasible, taking into account the crisis situation in each third country. The same is proposed for the systematic physical and sampling to be carried by Member States authorities.

The list of COP delegates

Regarding the OFIS notification

The deadline of 30 days could be extended regarding particular situations.

**We are looking very carefully at these proposals. We will provide you with some more information on the possibilities to provide legal grounds to Competent authorities, Control bodies and operators in this crisis situation as soon as possible.**

Yours sincerely,



Nathalie SAUZE- VANDEVYVER