

Global Certification and Monitoring Services

Procedure for cooperation and communication between EU commission and GCMS.



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GCMS
Global Certification and Monitoring Services

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Reporting and Use of Electronic Systems (OFIS & TRACES)

The Certification Body operates within a larger framework of oversight and information exchange that involves EU authorities and databases. Two key systems used are **OFIS (Organic Farming Information System)** and **TRACES (Trade Control and Expert System)**. Additionally, the CB must fulfill reporting obligations to the European Commission.

1. Annual Reporting to the Commission:

As a recognized third-country control body, GCMS is required to submit an **annual report** to the European Commission by 28 February each year. This report (submitted in English) details GCMS activities and compliance with organic rules over the previous year. It includes:

- Updates to GCMS technical dossier (any changes in legal status, accreditation, key personnel, etc.) as per article 19 of the regulation (EU) 2021/1698.
- The list of countries and product categories under GCMS control and number of operators in each.
- Summary of inspections carried out, including total number of operators, number of inspections, number of unannounced visits (to show the $\geq 10\%$ rule was met), number of samples taken (showing the $\geq 5\%$ sampling was met).
- Results of oversight: statistics on non-compliances and sanctions. Specifically, **the number of OFIS notifications of suspected or established non-compliance** GCMS dealt with, and the measures taken. Also, the annual report will indicate how many operators were suspended or certificates withdrawn, etc.
- Any noteworthy issues or improvements, training of staff, and how GCMS addressed Commission feedback from the previous year.
- It also covers **witness audits** and internal audit findings (GCMS must perform internal audits and witness inspections on its inspectors as part of quality control, per Reg. 2021/1698).

The annual report essentially demonstrates GCMS performance and enforcement of organic rules, enabling the Commission to supervise GCMS recognition. GCMS compiles this information continuously (e.g. via the sanctions register, inspection logs) to ensure accurate reporting.

2. Organic Farming Information System (OFIS):

OFIS is the platform for exchange of information on organic irregularities and breaches among EU Member States, the Commission, and control bodies. GCMS is **required to use OFIS for timely information exchange**. Key uses:

- **Notification of Irregularities:** If the CB detects a suspected or established non-compliance on a product that **could affect trade** (especially exports to the EU or products from another CB), it uses OFIS to notify authorities. For example, if a pesticide residue is found in an organic product batch intended for export, GCMS would create an OFIS notification so that the importing country's authorities are aware to hold or check the product. The notification includes details of the operator, product, issue, and actions being taken.
- **Responding to Notifications:** GCMS also might receive notifications via OFIS if a Member State finds a problem in a product certified by GCMS (e.g. at border control or on the market). In such cases, the Commission forwards the info to GCMS. GCMS must investigate and respond through OFIS within 30 days, detailing what they found and what actions were taken. GCMS uses the standard templates (Annex III of Reg. 2021/1698) to reply to these international non-compliance notifications.
- **General Exchange:** GCMS uses OFIS to communicate with other control bodies or authorities if an operator is switching CBs (ensuring the control file is passed on as required) or if they discover an operator under their control had dealings with another CB's operator in a fraudulent way, etc. Essentially, OFIS is the secure channel recognized by the EU for these exchanges.

GCMS has internal procedures to ensure any staff member handling OFIS notifications does so quickly. There are documented processes for investigation triggered by an OFIS case (including possibly extra inspections or sampling).

3. TRACES (Trade Control and Expert System):

TRACES is the EU's online platform for sanitary and phytosanitary certifications, including organic import certificates. GCMS responsibilities with TRACES include:

- **Certificates of Inspection (COI):** For each consignment of organic products that the operator exports to the EU, GCMS must issue a **Certificate of Inspection** through TRACES. The COI attests that the product is certified organic and complies with Reg. 2018/848. The process is:
 - The operator/exporter notifies GCMS of a planned shipment, providing details (product, quantities, destination, importer, etc.).
 - GCMS verifies the product is indeed certified and traceable to the operator's certified production. If all is in order, GCMS fills out the electronic COI on TRACES, including reference to the operator's certificate of compliance, lot numbers, transport details, etc.
 - GCMS inspector or authorized certifier will sign off the COI (often electronically with a digital certificate) **before the consignment leaves the third country**. This COI travels with the shipment (electronically accessible) and EU border control posts will check it upon import.
 - If the consignment is bulk and involves multiple stages in transit, GCMS also, as required by Article 16(5) of Reg. 2021/1698, **draws up a travel plan in TRACES** detailing all the premises and points the shipment will pass through from origin to EU. This ensures traceability during long transport routes (for example, bulk grain going through various warehouses).
 - GCMS only validates the COI if everything is compliant. If there were any issues (like pending lab results or suspicion), GCMS would not issue or would cancel the COI, effectively blocking the organic import until resolved.
- **Operator Registration (if applicable):** TRACES has a module for listing organic operators and control bodies. GCMS ensures that all certified operators intended to export are registered in TRACES with their valid certificate info. This helps EU importers to select the correct operator from a drop-down and link the COI.

- **Using TRACES Data:** GCMS monitors the COIs it issues via TRACES to ensure all exports are accounted for. TRACES provides an audit trail. If an issue arises with a consignment, GCMS can use TRACES to see who approved the COI and what notes were included (or if any part of the shipment was split or modified en route, since TRACES handles that).

Other Reporting:

- GCMS informs the Commission of any significant changes such as changes in accreditation scope, key personnel, or if it wishes to extend its scope to new product categories or countries (such requests are made via formal channels, often requiring updated dossiers as per Delegated Reg. 2021/1698).
- If GCMS ever has to suspend or terminate an operator's certificate, and that operator had products in transit to the EU, GCMS will proactively alert the relevant border control post or national authority via OFIS or direct communication, to prevent the product from being sold as organic. This ties into both reporting and non-compliance handling.

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4. Record-keeping of Communications:

GCMS keeps copies/records of all OFIS notifications sent or received, TRACES COIs issued, and annual reports submitted. These may be audited by the Commission during their supervision audits of GCMS. GCMS use of these electronic systems is itself subject to evaluation by EU auditors to ensure proper implementation.

5. Data Protection and Access:

All electronic exchanges comply with data protection laws. Only authorized GCMS personnel have access to OFIS and TRACES for the CB's scope. They use secure logins and follow the EU's guidelines for these systems.

By fulfilling these reporting and electronic system obligations, GCMS contributes to the overall integrity and traceability of organic products from the third country to the EU market. It ensures that information flows efficiently: any **suspected non-compliance is quickly shared via OFIS** and every **certified organic shipment is transparently documented in TRACES** for scrutiny.

Computer systems of GCMS are secured and the access is granted to only authorized personnel which allowing to identify each person and guarantee that the integrity of the content of the documents, including as regards the stages of the procedure, cannot be altered.

6. Operator with different control authority:

As per article 21 from the regulation (EU) 2021/1698, where operators or groups of operators and/or their subcontractors are subject to controls by different control authorities or control bodies, those control authorities or control bodies shall exchange the relevant information on the operations covered by their control activities.

Where operators or groups of operators and/or their subcontractors change their control authority or control body, the new control authority or control body shall request the control file of the operator or group of operators concerned from the previous control authority or control body. The previous control authority or control body shall, within 30 days, provide to the new control authority or control body the control file of the operator or group of operators concerned and the written records, the status of the certification, the list of non-compliances and the corresponding measures taken by the previous control authority or control body.

The new control authority or control body shall ensure that non-compliances noted in the report of the previous control authority or control body have been addressed by the operators or groups of operators.

Where operators or groups of operators are subject to a traceability check and a mass balance check, GCMS shall exchange the relevant information allowing finalization of these checks.

7. Notification to Authorities (OFIS):

For serious cases, especially those **affecting products already exported or likely to be exported**, GCMS will use the Organic Farming Information System (OFIS) to notify the European Commission and EU Member States. For example, if GCMS finds that a shipment of “organic” product destined to the EU is contaminated or fraudulent, it must send an OFIS notification (or respond to one initiated by an EU member). Implementing Reg. 2021/279 specifies that when a suspected non-compliance could affect the integrity of organic products in another country, an alert should be raised.

- As per article 27 from the regulation (EU) 2021/1698 concerning the reporting on provisional authorization for the use of non-organic agricultural ingredients for processed organic food, GCMS, upon such findings, shares information immediately with the Commission, other CBs, and competent authorities. That notification shall include the justification, presented in the dedicated form made available by the Commission, that such authorization has been granted in accordance with Article 25(1) of Regulation (EU) 2018/848.

8. Information requirements

As per article 19 of the regulation (EU) 2021/1698, GCMS, after its recognition, notify the Commission in due time, and not later than within 30 calendar days, of the occurrence of changes to the content of its technical dossier.

GCMS keep available and communicate at the request of the Commission or the competent authorities of the Member States all information related to its control activities in the third country.

The supporting documents relating to the request for recognition are kept by GCMS at the disposal of the Commission and the Member States for 5 years following the year in which the controls took place or the certificate referred to in point (b)(i) of Article 45(1) of Regulation (EU) 2018/848 and documentary evidence were delivered.

9. DOCUMENT HISTORY

Version number	Description	Date
01	First release	2025-07-24
02	Added chapter 8: Information requirements	2025-10-29
03	Added history of the document.	2025-12-02



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