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Comparative mapping of institutions involved in organic agricultural inspection and certification in Germany and China

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EXECUTIVE SUMMARY

This study maps the institutional architecture governing organic certification in Germany/EU and China, identifies the key actors on both sides, and charts the certification routes relevant to bilateral organic trade. It was prepared in connection with a German business delegation attending Biofach China in Shanghai in May 2026.

The two systems rest on fundamentally different regulatory philosophies. The EU system distributes certification authority across a competitive market of private control bodies under multi-level public oversight, with EU Regulation 2018/848 as the single harmonized legal basis. The Chinese system concentrates authority centrally: the State Administration for Market Regulation (SAMR) and its subordinate body, the Certification and Accreditation Administration of China (CNCA), govern who may certify, under what rules, and against what technical standard (GB/T 19630-2019). The 2026 updated CNCA implementing rules have significantly tightened requirements for certification bodies, shifting oversight toward ongoing verification of real-world compliance.

Both systems exhibit a parallel functional architecture – ministry, standard-setter, approval authority, accreditation body, and customs interface – but the allocation of functions differs markedly. In Germany/EU, responsibilities are distributed across multiple levels of government and partly delegated to private bodies under public oversight. In China, the equivalent functions are concentrated at national level, with no sub-national delegation in the certification architecture. Beyond public institutions, the German/EU associational landscape is dense and autonomous, whereas the most significant Chinese non-governmental actors operate within or subordinate to the agricultural ministry.

For companies seeking market access in either direction, double certification is the unavoidable consequence of the absence of mutual recognition. A German producer wishing to sell organic products in China must obtain a separate Chinese certificate from a CNCA-approved body; EU certification provides no legal basis for organic claims in China. Conversely, Chinese exporters must hold EU Regulation 2018/848 certification from an EU-listed control body. For the foreseeable future, companies operating in both markets must plan for the costs and procedural requirements of two entirely independent certification systems.

Chapter 1: Introduction

1.1 Purpose and scope

This study maps the institutional architecture governing organic certification in Germany/EU and China, identifies the key actors on both sides, and charts the certifiers and control bodies bridging the two systems. It is not a legal handbook and does not provide certification advice. Its purpose is to give structured orientation to practitioners: who does what, under what legal basis, and with what consequences for companies seeking to bring products to market on either side.

The scope is limited to organic certification architecture. Adjacent topics – including general food safety regulation, import logistics, tariff classification, and trade promotion measures – fall outside its remit and are not treated here.

1.2 Study background

The report was prepared in connection with a German business delegation attending Biofach China in Shanghai in May 2026. Biofach China, organized by NürnbergMesse China Co., Ltd., is one of the few professional B2B platforms for international organic trade in Asia and serves as a reference point for German-Chinese engagement in the organic sector. The bilateral context makes it particularly relevant to map not only each system in isolation, but also the routes by which products and certifications cross between them.

1.3 A note on terminology

The two systems use different terminological conventions. The EU system refers to **control bodies** (*Kontrollstellen*) – private entities that carry out both inspection and certification under public oversight. The Chinese system refers to **certification bodies** (认证机构) – bodies approved by CNCA that inspect and certify against GB/T 19630. Where the distinction matters, this report uses the system-specific term. Where the reference is generic, "certifier" or "certification body" is used for both.

Similarly, "organic" in this report always refers to certified organic production under the applicable legal standard – EU Regulation 2018/848 in the European context, GB/T 19630-2019 in the Chinese context. Neither Green Food Grade A nor Grade AA constitutes a valid organic certification in either market and is treated separately in Chapter 3.

Chapter 2: EU and China's regulatory frameworks in the field of organic certification

This chapter sets out the legal and regulatory architecture governing organic certification in the EU/Germany and China respectively. It maps the core legislation and, in a comparative overview, identifies the structural differences that are most relevant for companies operating in both markets.

2.1 The legal basis governing organic certification in the EU / Germany

Regulation (EU) 2018/848 (in force 1 January 2022, replacing EC 834/2007) is the single harmonized legal basis for organic production, labelling, and controls across all EU member states

(European Union, 2022). In Germany it is supplemented by the *Öko-Landbaugesetz* (ÖLG, 2021) as national implementing legislation (BMLEH, 2021).

For third-country imports, the Commission Delegated Regulation (EU) 2021/1378 lists the control bodies recognized to certify organic products from non-EU countries. Since 1 January 2022, this operates as a **compliance regime**: third-country products must fully comply with EU Regulation 2018/848, not merely with a system deemed equivalent. However, China has never held EU equivalence status. Chinese exports to the EU have always required certification against the EU's organic standard by an internationally recognized EU-listed body.

2.2 The legal basis governing organic certification in China

China's organic certification system rests on four interlocking instruments (USDA Foreign Agricultural Service, 2019; China Briefing, 2026):

- **Food Safety Law of the People's Republic of China** (2015 revision): the overarching statutory framework for food safety governance in China, under which the certification of food quality claims – including organic products – also falls.
- **Regulations on Certification and Accreditation** (State Council Decree No. 390, 2003, revised 2016): the primary regulatory basis for the national certification and accreditation system, establishes the China National Certification and Accreditation Administration (CNCA) authority over all product certifications.
- **CNCA Implementing Rules for Organic Product Certification**: detailed procedural rules for certification bodies. The most recent version issued 16 December 2025, in force on 1 January 2026, significantly tightened requirements for certification bodies.
- **National Standard GB/T 19630-2019**: the technical standard governing all organic certification in China. First enacted in 2005, last revised in 2019, the current version has been in force since 1 January 2020 (SAMR and SAC, 2019)¹.

2.3 Comparative system logic

The two systems embody fundamentally different regulatory philosophies. The EU system distributes certification authority across a competitive market of private bodies under multi-level public oversight. The Chinese system concentrates authority centrally and uses the state to govern both the rules and who may apply them. Neither system recognizes the other as equivalent. For businesses, the consequence is straightforward: operating in both markets requires engaging separately with both systems, holding both certificates, and working with certifiers that hold the right approvals on both sides.

¹ For an unofficial translation of the standard see: <https://www.chinesestandard.net/PDF.aspx/GBT19630-2019>

Table 1: Structural differences of EU/German and Chinese organic certifications systems

Feature	EU / Germany	China
Governance logic	Private certification under public oversight (decentralized): competing private control bodies (Öko-Kontrollstellen) approved and supervised by federal and Länder authorities.	State-supervised, centrally governed certification (centralized): CNCA approves all certification bodies and sets all procedural rules; no sub-national delegation.
Accreditation standard for control/certification bodies	DIN EN ISO/IEC 17065	GB/T 27065 (China's equivalent of ISO/IEC 17065). Mandatory CNCA approval and CNAS* accreditation.
Certificate / traceability platform	TRACES.NT: mandatory for all EU control bodies since 1 January 2023; enables electronic supply-chain verification.	CNCA national organic product supervision platform: all certified products must be registered; platform-generated QR code mandatory on packaging, enabling consumer-facing traceability.
Organic logo	EU organic logo: mandatory for pre-packaged products produced within the EU; technically optional for certified third country products, but used in practice by virtually all Chinese exporters.. Control body code (DE-ÖKO-XXX) must accompany the logo if used.	National organic logo: mandatory for all CNCA-certified products; issued per batch, linked to a unique platform code. Cannot be substituted by any foreign mark.
Third-country import regime	Compliance regime (since 1 Jan 2022): third-country products must comply fully with EU 2018/848; certifying body must hold current EU recognition under Regulation 2021/1378.	No equivalence regime: all products marketed as organic in China must hold domestic certification under GB/T 19630. Foreign certification bodies certifying products for the Chinese market require CNCA-RF approval. Products arriving with only foreign organic labeling must cover all organic claims before sale.
Audit timing	Annual inspection (at least one announced per year) plus unannounced spot checks; audits may occur at any point in the production cycle.	Inspection must be performed before or during harvest so the auditor can observe and sample the actual product.
Supply-chain scope	Final processing stage certification may suffice in certain cases.	Full supply chain from raw materials to final product must be certified under GB/T 19630.

Mutual recognition	No equivalence arrangement exists with China.	One arrangement in force (with New Zealand); a Memorandum of Understanding with Denmark, Letters of Intent with Australia, Finland and Chile, not yet formalized. No arrangement with EU.
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*: CNAS = China National Accreditation Service for Conformity Assessment.

Chapter 3: Roles and responsibilities of public institutions

3.1 Synoptic overview

The table below maps the principal public institutions on both sides against their functional roles in the organic certification system. The allocation of functions is structurally parallel – both systems have a ministry, a standard-setter, an approval authority, an accreditation body, and a customs interface – but the institutional logic differs markedly. In Germany/EU, functions are distributed across multiple levels of government and partly delegated to private bodies under public oversight (BLE, 2026a). In China, the same functions are concentrated at national level under SAMR and its subordinate bodies, with no sub-national delegation in the certification architecture (Xiao, 2024).

Table 2: Synoptic overview of public institutions involved in the organic certification system

Function	Germany / EU	China
Policy responsibility / Ministry	Federal Ministry of Food and Agriculture (BMLEH)	Ministry of Agriculture and Rural Affairs (MARA)
Standard setting	European Commission: Regulation (EU) 2018/848; National implementing legislation: Organic Farming Act (ÖLG, 2021)	State Administration for Market Regulation (SAMR): Standard GB/T 19630-2019
Approval of certification / control bodies	Federal Office for Agriculture and Food (BLE)	Certification and Accreditation Administration of China (CNCA)
Accreditation of certification / control bodies	German Accreditation Body (DAkkS)	China National Accreditation Service for Conformity Assessment (CNAS)
Qualification of individual inspectors	No separate body – inspector competence is verified as part of the DAkkS accreditation of the control body as a whole	CCAA (China Certification and Accreditation Association) – mandatory registration and qualification of all organic certification inspectors
Market supervision / ongoing monitoring	Federal state authorities (e.g. Federal State Offices for Agriculture); BLE	SAMR (national level) and local market supervision authorities

	conducts annual audits of control bodies	
Import control / customs interface	Customs / EU TRACES.NT system (electronic certificate register since 2023)	Customs authority (General Administration of Customs of China, GACC); CNCA for product approval of imported organic goods
Green Food / organic promotion	<i>(no direct equivalent)</i>	China Green Food Development Center (CGFDC), under MARA; parent body of China Organic Food Certification Center (COFCC)
Funding / Research	Federal Organic Farming Program (BÖL), BLE as project sponsor	China Institute for Eco-Environmental Sciences; state research programs via MARA

3.2 German and EU institutions in detail

Federal Ministry of Food and Agriculture (BMLEH)

The BMLEH is the politically responsible body for organic farming in Germany. It owns the German organic seal (in use since 2001) and administers the Federal Organic Farming Program (BÖL). The overarching legal basis is EU law, not national ministerial law.

Federal Office for Agriculture and Food (BLE)

The BLE is the central approval authority for private organic control bodies at federal level. Pre-requisites for approval include accreditation under DIN EN ISO/IEC 17065 by DAkkS and evidence of adequately qualified staff. The BLE additionally conducts an annual supervisory audit of all approved control bodies.

German Accreditation Body (DAkkS)

DAkkS accredits private control bodies under the standard DIN EN ISO/IEC 17065, confirming their technical competence for inspection and certification tasks. It is Germany's national accreditation body and operates within the European cooperation for Accreditation (EA) network.

State Authorities (Bundesländer)

The state level authorities bear day-to-day operational responsibility for supervising the control bodies active in their territory and the operators those bodies certify.

TRACES.NT

Since 1 January 2023, TRACES.NT has been the official EU platform on which all European control bodies publish their certificates under EU Organic Regulation 2018/848. The system enables electronic supply-chain verification and is the reference system for import Certificate of Inspection (COI) management.

3.3 Chinese institutions in detail

State Administration for Market Regulation (SAMR)

SAMR is the overarching regulatory authority for standardization, market supervision, and product safety in China. SAMR issues "GB/T 19630 - Organic Products: Requirements for Production, Processing, Labelling, and Management Systems", the national organic standard. It also supervises CNCA and CNAS.

Certification and Accreditation Administration of China (CNCA)

The CNCA is the Chinese equivalent of the German BLE, i.e. the central state authority for the approval of organic certification bodies². The 2026 implementing rules significantly tighten the requirements for certification bodies: mandatory CNCA approval, full conformity with GB/T 27065, digital lifecycle management systems, clear internal separation of functions, and registration of all certified products on the CNCA national supervision platform (China Briefing, 2026). Foreign certification bodies are approved under the designation **CNCA-RF** (as opposed to **CNCA-R** for domestic bodies), which appears in their approval number. CNCA does not itself certify; it sets rules, approves certification bodies, and operates the platform.

China Certification and Accreditation Association (CCAA)

The CCAA occupies a distinct position in the Chinese organic certification architecture that has no direct equivalent in the German/EU system. It was established by CNCA in September 2005 as a national non-profit industry organization and operates under the supervision of the SMAR and its registration authority, the Ministry of Civil Affairs. Even though it is formally an association and not a government agency, it has a mandatory function in the certification chain which makes it closer to a regulatory body than a private association. Its specific function in the organic certification chain is the qualification and registration of individual inspectors: all inspectors working for organic certification bodies must hold a qualification registered with CCAA, obtained through CCAA-organized training, testing, and interviews. This gives CCAA a mandatory role at the level of individual personnel, complementing CNCA's approval of certification bodies as organizations and CNAS's technical accreditation of those bodies³.

China National Accreditation Service for Conformity Assessment (CNAS)

CNAS is China's national accreditation body, legally validated by SAMR. It accredits certification bodies, laboratories, inspection bodies, and validation bodies. Certification bodies wishing to

² The authoritative list of all CNCA-approved certification bodies is the National Certification & Accreditation Public Service Platform: <http://cx.cnca.cn/CertECloud/institutionBody/authenticetionList>.

³ The implementing rules make no distinction between domestic and foreign inspectors. The requirement applies to inspectors working for any CNCA-approved body, whether domestic (CNCA-R) or foreign (CNCA-RF).

conduct organic certifications under GB/T 19630 require both CNCA approval and CNAS accreditation.

Ministry of Agriculture and Rural Affairs (MARA)

MARA is functionally equivalent to BMLEH, responsible for agricultural policy frameworks and organic farming promotion. It plays a secondary role to SAMR and CNCA within the certification architecture but is the parent body of the China Green Food Development Center (CGFDC) and thereby the China Organic Food Certification Center (COFCC).

China Green Food Development Center (CGFDC)

Founded in 1992 under MARA, the CGFDC manages China's Green Food program. It owns the Green Food logo (see Box 1) and is the parent body of the COFCC. This latter one, established in 2002, handles day-to-day organic certification and is one of China's largest certifiers. The two institutions are closely intertwined: COFCC operates under CNCA approval for organic certification, but within CGFDC's organizational framework.

Box 1: China's Green Food Program labels

Green Food Grade A permits controlled use of agrochemicals and focuses on end-product residue testing. It is China's oldest government-backed food quality label and remains widely used. It occupies a tier between conventional and organic but is not a substitute for organic certification.

Green Food Grade AA, introduced in 1995, required compliance with international organic standards and was explicitly treated by CGFDC as equivalent to organic at the time. However, from 2002 COFCC's dedicated organic label effectively displaced it, and from 2005 onwards, GB/T 19630 and CNCA approval became the legal framework governing all organic certification (Sternfeld, 2023). Grade AA was never formally abolished, but it is operationally defunct. No new registrations have been recorded since approximately 2008 (Hassan et al., 2020).

Neither Green Food grade constitutes a valid organic certification for the Chinese domestic market or for EU export.

General Administration of Customs China (GACC)

GACC is China's customs authority and the border enforcement interface of the organic certification system. Importers must be registered with GACC and must demonstrate product conformity with Chinese standards. GACC verifies that shipments are accompanied by valid documentation, including the Chinese organic certificate issued by a CNCA-approved body.⁴

⁴ GACC was formed in 2018. The market regulation functions were previously shared by three separate agencies, namely the former General Administration of Quality Supervision, Inspection and Quarantine (AQSIQ), the China Food and Drug Administration (CFDA), and the State Administration of Industry and Commerce (SAIC).

Chapter 4: Private and semi-public actors: Associations & standards bodies

Beyond the public institutions mapped in Chapter 3, both systems encompass a layer of private and semi-public actors – farming associations, industry federations, research institutes, and trade fair operators – that shape standards, markets, and political frameworks without holding formal regulatory authority. This chapter maps the most relevant actors on both sides and concludes with a structural comparison that has direct practical implications for German stakeholders engaging with Chinese counterparts.

4.1 Private and semi-public actors in Germany / EU

BÖLW – Bund Ökologische Lebensmittelwirtschaft (Federation of the Organic Food Industry)

The BÖLW is the leading umbrella association for the German organic sector, representing producers, processors, and retailers. It coordinates political positions, advocates at federal and EU level, and publishes the annual industry statistical report. All nine German organic farming associations are members of the BÖLW⁵.

Bioland, Naturland, Demeter

A significant share of German organic production operates not merely to the EU minimum standard, but to stricter private association standards. Three are particularly relevant in the bilateral context. **Bioland** is the largest German-only organic farming association, operating in Germany and South Tyrol. **Naturland** (founded 1982) operates internationally with around 38,000 farms in more than 44 countries across agriculture, aquaculture, beekeeping, forestry, cosmetics, and textiles, and is also active in Asia. **Demeter**, the oldest German organic movement, is rooted in Rudolf Steiner's biodynamic agriculture principles and has member organizations in 36 countries.

Products carrying these labels command premium positioning in European markets. Chinese buyers should be aware that these are voluntary additions going beyond EU law, not separate competing systems, and carry no regulatory weight within the Chinese certification architecture.

AöL – Association of Organic Food Producers (Assoziation ökologischer Lebensmittelhersteller)

The AöL represents organic food manufacturers and processors in Germany and advocates for their interests in regulatory and market policy discussions.

FiBL – Research Institute of Organic Agriculture

FiBL is the world's leading independent research institute for organic agriculture, with offices in Switzerland (headquarters), Germany, Austria, France, and Belgium. FiBL is a supporting member of BÖLW and a member of IFOAM Organics International. Its annual *The World of Organic Agriculture*, co-published with IFOAM, is the global statistical reference for the organic sector including China⁶. FiBL has participated in joint events at Biofach China.

⁵ For an overview of the different associations and semi-public actors in Germany see for example: BÖLW (2026), Willer et al. (2026), IFOAM Organics International (2026a) or Umweltbundesamt (2025).

⁶ The latest report, published in February 2026. Willer et al. (2026).

IFOAM Organics Europe

The European regional grouping of IFOAM Organics International represents the interests of the organic sector at EU institutional level vis-à-vis the European Commission and the European Parliament⁷. The BÖLW coordinates the German-speaking members within the IFOAM European network. IFOAM Organics International is the patron of both Biofach Nuremberg and Biofach China, applying strict admission criteria for exhibitors.

4.2 Private and semi-public actors in China

IFOAM Asia

IFOAM Asia is the regional chapter of IFOAM Organics International for the Asia-Pacific region. It connects Chinese organic actors to the global organic movement and has been present at Biofach China. IFOAM Asia serves as a soft bridge between China's state-governed certification architecture and the international organic community (IFOAM Organics International, 2026b and IFOAM Asia, 2026).

China Agricultural University (CAU)

The China Agricultural University is CNCA's primary statistical and research partner for the organic sector. The annual report on organic product certification and organic industry development in China - the standard statistical reference - is co-produced by CNCA and CAU (Naturland e.V., 2024). The university is the Chinese knowledge-generation counterpart to FiBL.

NürnbergMesse China Co., Ltd.

NürnbergMesse China is a subsidiary of the NürnbergMesse Group and the organiser of Biofach China (Biofach China, 2026). Established in 2007, it is the institutional link between the world's leading organic trade fair in Nuremberg and the Chinese market, and one of the few professional B2B international organic trade platforms in Asia.

4.3 Concluding analysis: structural differences between both actor landscapes

The two actor landscapes reflect the regulatory asymmetry identified in Chapter 2.

On the German/EU side, the associational landscape is dense, autonomous, and historically prior to the regulatory framework: associations set their own standards, run their own certification infrastructures, and advocate through the BÖLW. Research (FiBL) is genuinely non-governmental.

On the Chinese side, the most significant non-governmental actors - COFCC and CGFDC - are embedded within or subordinate to MARA. CAU produces its key organic statistics jointly with CNCA.

The practical consequence for German stakeholders is twofold. First, when engaging with Chinese counterparts from institutions such as COFCC or CGFDC, they are in effect engaging with actors operating within and accountable to the Chinese state system. Second, Bioland, Naturland,

⁷ IFOAM Organics International is the global umbrella organization for the organic movement, comprising around 800 member organizations in more than 100 countries.

and Demeter labels have reputational but no regulatory value in China and cannot substitute for Chinese GB/T 19630 certification.

Chapter 5: Certification and control bodies

5.1 The control body system in Germany / EU

The key institutional actors in the EU/German system are the private **Öko-Kontrollstellen**, (organic control bodies) (BLE, 2026b). Each control body carries out two strictly separate functions: **inspection** – the inspector visits the operator, examines records, takes samples, and writes a report – and the **certification** – a separate person within the same control body reviews the report and decides whether to issue or renew the certificate. This four-eyes principle is a structural requirement; the two functions cannot be performed by the same personnel.

To operate in Germany, a control body must obtain BLE approval (requiring DAkkS accreditation under DIN EN ISO/IEC 17065) and is subsequently supervised by the Federal States. On top of this, the BLE conducts an annual supervisory audit of each approved control body. As of January 2026, there are **21 control bodies** approved to operate in Germany, each identified by a DE-ÖKO-XXX code. Every certified **operator** – the farms, processors, and traders – receives at minimum one annual inspection, supplemented by unannounced risk-based spot checks. Since January 2023, all European control bodies publish their operator certificates on TRACES.NT, which is also the reference system for import Certificate of Inspection (IOC) management.

5.2 The certification body system in China

China operates a **centrally governed system** in which the CNCA approves certification bodies and CNAS provides the underlying technical accreditation (China Briefing, 2026, USDA Foreign Agricultural Service, 2022). As described in chapter 2.2, the 2026 implementing rules significantly raise the threshold for accreditation. The new framework shifts oversight away from front-loaded approval toward **ongoing verification of real-world compliance**. Certified organic status is now expected to reflect sustained production practices supported by verifiable, digitally managed data.

Within the registry, CNCA distinguishes between two categories of approved body:

- **CNCA-R** – domestic certification bodies, incorporated and registered in China.
- **CNCA-RF** – foreign certification bodies, incorporated outside China that have obtained CNCA approval to issue certificates for the Chinese market. Their primary function is to certify foreign (including German and EU) producers and products for import into China. They operate under the same GB/T 19630 standard and CNCA platform rules as domestic bodies.

As of June 2022, 104 bodies held CNCA approval. The 2026 tightening is expected to reduce this number. No updated aggregate figure has been officially published at the time of writing.

Major domestic certification bodies (CNCA-R) include:

- **COFCC – China Organic Food Certification Center:** Founded in 2002 under MARA and closely linked to CGFDC, COFCC is one of China's largest certifiers, covering both domestic and imported products. It co-organised the inaugural Biofach China in 2007.
- **OFDC – Organic Food Development and Certification Center of China:** Founded in 1994, is one of China's oldest certifiers and a training facility for organic certification inspectors. OFDC holds international recognition arrangements allowing access to selected export markets including the EU (see Chapter 5.4).
- **CQC – China Quality Certification Centre:** Major state-affiliated body under the CNCA umbrella, extending its services into Europe through CCIC Europe (Netherlands, with German representation; see Chapter 5.3).

5.3 Route from Germany/the EU to China: Certifying German and EU products to the Chinese standard

Key principle: Any German or EU producer wishing to use the word "organic" (有机, yǒujī) or the Chinese national organic logo on a product sold in China must hold a valid Chinese organic certificate issued by a CNCA-approved body, regardless of whether the product already carries an EU organic certificate. The EU certificate has no legal standing in China for the organic claims. A product arriving in China with only EU organic labelling must have all organic references physically covered on the packaging before sale.

Practical example: A German dairy producer

A German producer of organic cheese (EU-certified under Regulation 2018/848, carrying the EU organic logo and the code DE-ÖKO-007) wishes to sell the same product in China. The EU certificate is not recognized in China. The producer must engage a CNCA-approved body – for example Ecocert China (the CNCA-R approved Chinese entity within the Ecocert group – not Ecocert SAS, which holds EU rather than CNCA recognition) or Kiwa BCS – to conduct an inspection of its production facilities and supply chain in Germany against GB/T 19630-2019. If successful, the certifying body registers the product on the CNCA platform, issues the Chinese certificate, and provides the QR-code labels. Only then may the product be marketed as organic in China, displaying the Chinese national organic logo alongside the QR code. The EU organic logo may remain on the same packaging but carries no legal weight for the Chinese organic claim.

The **diagram in Annex 1** sets out the steps a German organic producer must follow to legally market its products as organic in China. The process is linear and non-negotiable: there are no shortcuts, and EU organic certification does not substitute for any step.

Bodies active in certifying German and EU producers to GB/T 19630

The following bodies are known to be active in this route. In practice, very few foreign-headquartered bodies hold direct CNCA approval for GB/T 19630. Most work through a Chinese subsidiary or partner. For example, Ecocert operates via ECOCERT China (CNCA/CNAS accredited), and CQC (China Quality Certification Center) serves European producers through CCIC Europe⁸.

- **Ecocert China** is the Chinese subsidiary of the French Ecocert group, incorporated and registered in China as a domestic certification body (CNCA-R)⁹. Ecocert China draws on Ecocert's European office network, including Germany, for on-site audits of European producers to issue the GB/T 19630 certificate. It can also combine a GB/T 19630 audit with an EU organic audit in a single visit.
- **CCIC Europe / CQC** (China Certification and Inspection Group Europe, based in the Netherlands with representation in Germany), having a CNCA-R status via CQC. It is the European liaison of CQC, a major Chinese state certification body. Local auditors conduct the GB/T 19630 inspection in Europe, the certification decision is made by CQC in China.
- **Kiwa BCS Öko-Garantie China Co., Ltd.**, incorporated in China and operating as a domestic certification body (CNCA-R), issues GB/T 19630 certification for the Chinese market. It conducts inspection and certification activities in China and, through the Kiwa group network, can extend inspection services to European production sites for the purpose of issuing the GB/T 19630 certificate. German producers may use the German parent as their primary contact point for both certification directions, while the certifying legal entities on each side remain distinct: Kiwa BCS Öko-Garantie GmbH for the EU certificate, Kiwa BCS China for the Chinese certificate¹⁰.
- **Control Union** offers GB/T 19630 certification services globally through a partnership via a CNCA-R registered partner.

⁸ For more details see the individual websites of these certification bodies. For Ecocert see: <https://www.ecocert.com/en/certification-detail/organic-farming-china-gb-t19630-2019>. For CCIC Europe see: <https://www.cciceu.com/?m=home&c=View&a=index&aid=540>. For Kiwa see: http://en.kiwa-bcschina.com/rz_1/15364713.html. For Control Union see: <https://www.controlunion.com/certification-program/china-national-organic-standard/>.

⁹ This structural choice - operating as a Chinese legal entity rather than as a foreign body - means that Ecocert China functions within the national registry on the same basis as other Chinese certifiers such as COFCC or OFDC and is not subject to the additional RF requirements for foreign bodies.

¹⁰ This is structurally the same as the Ecocert China / Ecocert SAS distinction. However, it could not be verified whether a combined EU/GB/T 19630 audit in a single site visit is available. This should be clarified with Kiwa BCS on a case-by-case basis.

5.4 Route from China to Germany/the EU: Certifying Chinese products to the EU standard

Key principle: Chinese producers wishing to export organic products to Germany and the EU must hold certification under **EU Regulation 2018/848**, issued by a control body listed under Regulation (EU) 2021/1378. Chinese organic certification - even from COFCC or OFDC - has no legal standing in the EU for this purpose.

Practical example: A Chinese tea producer

A Chinese tea producer in Yunnan holds a valid Chinese organic certificate issued by COFCC under GB/T 19630. This certificate is required for domestic sales in China, but it does not entitle the product to be marketed as organic in Germany. To export to the EU, the producer must separately engage an EU-listed control body - for example Ecocert SAS (France) or Kiwa BCS Öko-Garantie GmbH (Germany) - to conduct an inspection of the Yunnan production site against EU Regulation 2018/848. The EU-listed body sends or deploys an auditor to China, conducts the inspection, and, if the site meets EU requirements, issues an EU-compliant certificate registered on TRACES.NT. The product may then enter the EU market carrying the EU organic logo and the control body code. The Chinese organic certificate is not mentioned on the EU-market packaging, and the COFCC certification does not reduce the scope of the EU inspection in any way.

Currently, a total of 56 control authorities and control bodies are listed under Regulation 2021/1378 (Agrinfo, 2025). They operate in China through local offices, partner arrangements, or directly deployed inspection personnel, but the certificate and the legal liability for its issuance rest with the EU-listed legal entity.

EU-recognized control bodies operating in China

The following bodies hold EU recognition under Regulation 2021/1378 and are known to operate inspection activities in China. The certifying entity in each case is the EU-listed legal entity, not any Chinese subsidiary or partner.

- **Ecocert SAS** (France) is the EU-listed legal entity within the Ecocert group operating extensively in China. It is one of the most widely used certifiers for Chinese exporters targeting the EU market. Ecocert SAS is a distinct legal entity from Ecocert China: the EU certificate is issued by Ecocert SAS (France) and the Chinese certificate by Ecocert China (CNCA-R)¹¹. The two certificates are legally independent and neither substitutes the other.
- **Kiwa BCS Öko-Garantie GmbH** (formerly BCS Öko-Garantie, Nuremberg) holds EU control body approval for certifying to EU Regulation 2018/848. For Chinese operators, engaging a German-headquartered certifier may facilitate communication with German import partners.

¹¹ For the route from Germany to China, the certificate must be issued by a CNCA-approved body. Within the Ecocert group, this is exclusively Ecocert China which is the legal entity registered in China with CNCA-R approval. Ecocert SAS (France) does not have CNCA approval (neither R nor RF): It is the EU-listed body for the reverse direction.

- **OFDC** is one of the two Chinese domestic certification bodies holding EU recognition under Regulation 2021/1378 - added to the list in November 2024 – and thus allowing OFDC-certified products to access the EU market.¹²
- **Control Union** (Netherlands) is approved to certify to EU Regulation 2018/848 in 142 countries including China, making it one of the broadest-coverage bodies available to Chinese exporters targeting the EU.

5.5 Current status of mutual recognition

The EU and China do not recognize each other's organic systems as equivalent. Double certification is required for both directions.

On the Chinese side, one bilateral arrangement is in force with New Zealand, a Letter of Intent was signed with Australia in October 2024 but has not yet been converted into a formal mutual recognition arrangement (China Briefing, 2026). Furthermore, a Memorandum of Understanding with Denmark exists, covering cooperative goals in organic agriculture but not constituting a mutual recognition arrangement, and two other Letters of Intent with Chile and Finland exist¹³. No equivalent arrangement exists with any EU member state. The EU's 2022 shift from equivalence to compliance further reduced the structural basis for equivalence arrangements. And the 2026 CNCA rule tightening has made the Chinese route more demanding than before.

¹² The second Chinese domestic certification body holding EU recognition is Beijing Continental Hengtong Certification Co. Ltd. See Agrinfo (2025).

¹³ This information was provided by Prof. Qiao Yuhui from China Agricultural University in a presentation given on Biofach Nürnberg in February 2026, not publicly verifiable at time of writing.

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Annex

Annex 1 - Process Diagram: German Exporter → Chinese Market



Annex 2 - Name of Chinese institutions in Chinese

Ministry of Agriculture and Rural Affairs (MARA)	农业农村部
State Administration for Market Regulation (SAMR)	国家市场监督管理总局
Certification and Accreditation Administration of China (CNCA)	国家认证认可监督管理委员会
China Certification and Accreditation Association (CCAA)	中国认证认可协会
China National Accreditation Service for Conformity Assessment (CNAS)	中国合格评定国家认可委员会
Local market supervision authorities	地方市场监管局
General Administration of Customs China (GACC)	海关总署
China Organic Food Certification Center (COFCC)	中绿华夏有机食品认证中心
Organic Food Development and Certification Center of China (OFDC)	南京国环有机产品认证中心
China Quality Certification Centre (CQC)	中国质量认证中心



Sino-German Agricultural Centre (DCZ)