

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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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 or stores organic products;
- imports organic products from a third country in order to subsequently market them; or
- markets organic 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 descriptions of GDSN attributes used to exchange basic labelling data for organic products inside European countries. The data is primarily exchanged at base unit level. 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 the code number of the control authority/body displayed near the European organic logo, e.g. FR-BIO-15.
1244	organicProductPlaceOfFarmingCode	To indicate origin of the organic product displayed near European organic logo.
2801	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 2801, should equal FARMING.

3.1 Identification of an organic product (**BMS ID 1248**)

- **GDSN name:** organicTradeItemCode
- **Definition:** Used to indicate the organic status of a trade item or of one or more of its components.
- **Instruction:** Use one of the following codes to indicate whether product is organic, not organic or in conversion.
 - **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 2nd 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. This code value can only be used for unprocessed trade items (e.g. strawberries) and not for processed food (e.g. strawberry jam). A product that is "in conversion" may in the future be qualified as "organic".
 - **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) is blocked for Europe since 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
- **Definition:** The code representing a symbol or marking on the product and/or product package defined by a third party. This does not include regulatory markings.
- **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 5879**)

- **GDSN name:** organicCertificationIdentification
- **Definition:** A reference issued to confirm that something has passed organic certification.
- **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).

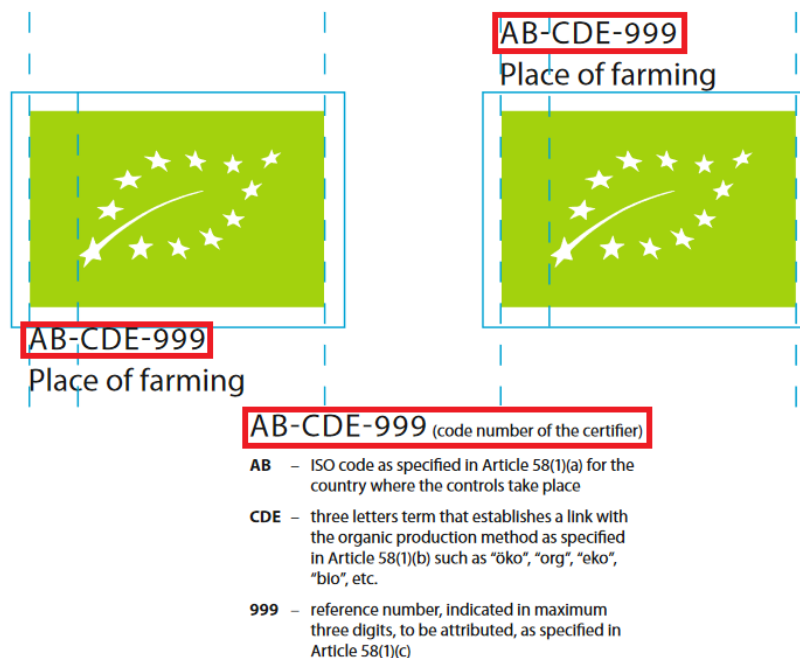
The labelling of the code number of the certification body is mandatory. It is constructed as follows:

- 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:

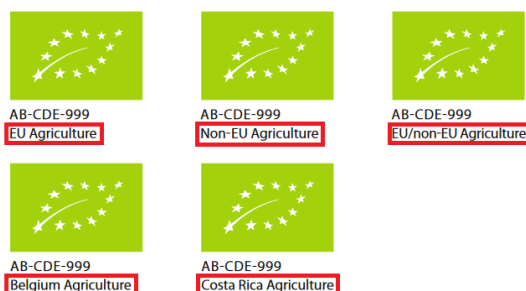
https://ec.europa.eu/agriculture/ofis_public/control-authorities-eu-eea-ch.html

- The list of inspection bodies and authorities in third countries is published on: https://agriculture.ec.europa.eu/farming/organic-farming/trade_enEuropean Commission - Agriculture - OFIS - Home
- **Example:** "FR-BIO-15", "AT-BIO-301"



3.4 Origin of agricultural raw materials ([BMS ID 1244](#))

- **GDSN name:** organicProductPlaceOfFarmingCode
- **Definition:** Indication of the place where the agricultural raw materials of which the product is composed have been farmed, acc. To Council Regulation (EC) No 834/2007. It applies only to the trade item, not ingredient by ingredient. Where the Community logo is used, an indication of the place where the agricultural raw materials of which the product is composed have been farmed, shall also appear in the same visual field as the logo and shall take one of the code list forms, as appropriate. For EU or NON-EU indication, small quantities by weight of ingredients may be disregarded provided, that the total quantity of the disregarded ingredients does not exceed 2 % of the total quantity by weight of raw materials of agricultural origin. This Regulation shall apply to the following products originating from agriculture, including aquaculture, where such products are placed on the market or are intended to be placed on the market: a) Live or unprocessed agricultural products; b) Processed agricultural products for use as food; c) Feed.; d) Vegetative propagating material and seeds for cultivation. The products of hunting and fishing of wild animals shall not be considered as organic production. This Regulation shall also apply to yeasts used as food or feed.
- **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 2801) = 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



4 Additional use cases for Organic Product Information

This chapter provides recommendations for the use of GDSN attributes that can support the exchange of supplementary information for organic and partially organic products within European countries. These recommendations are intended to enhance data transparency and facilitate access to relevant product information.

The recommended data is primarily exchanged at base unit level.

4.1 Products containing organic ingredients

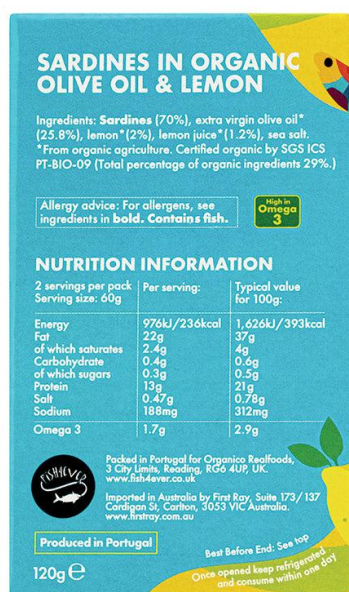
Whereas products not containing at least 95% organic ingredients are considered non-organic according to the regulation, they can still contain some organic ingredients. In this case, data suppliers can share following organic ingredients information.¹

4.1.1 Identification of a product containing organic ingredients (**BMS ID 1248**)

- **GDSN name:** [see 3.1](#)
- **Definition:** [see 3.1](#)
- **Instruction:** Use GDSN Code '4': Specific ingredients are identified as organic, but the product does not meet the regulated threshold for a broader organic-content claim
- **Example:** Code 4 - Specific ingredients are identified as organic, but the product does not meet the regulated threshold for a broader organic-content claim

4.1.2 Organic certification body (**BMS 5879**)

- **GDSN name:** [see 3.3](#)
- **Definition:** [see 3.3](#)
- **Instruction:** Provide the code number of the control authority or control body as stated on the label.
- **Example:** PT-BIO-09



¹ This does not apply and is not supported for target market Switzerland.

4.2 Sharing the organic certification

In case the data supplier is asked to share the organic certification for the product itself through the GDSN, following attributes are advised to use.

4.2.1 Digital Asset Type Code ([BMS ID 2999](#))

- **GDSN name:** referencedFileTypeCode
- **Definition:** The type of file that is being referenced for example Safety Data Sheet or Product Image.
- **Instruction:** Use code value 'ORGANIC_CERTIFICATE'
- **Remark:** The attribute must be used together with uniformResourceIdentifier (BMS ID 3000)

4.2.2 Digital Asset Link ([BMS ID 3000](#))

- **GDSN name:** uniformResourceIdentifier
- **Definition:** Simple text string that refers to a resource on the internet, URLs may refer to documents, resources, people, etc.
- **Instruction:** Share a direct URL link to the organic certificate associated with the product. To guarantee a trusted source of data for all organic certificates, the [European Commission](#) has set up a database where they can all be centralised: <https://webgate.ec.europa.eu/tracesnt/directory/publication/organic-operator/index> . Certification bodies register organic certificates in this database. It is available to everyone for possible compliance checks. Alternatively, if your certificates are not listed in this database, you may provide a direct URL to your certification record.
- **Remark:** The attribute must be used together with referencedFileTypeCode (BMS ID 2999)
- **Example:**
 - *PDF certificate:* <https://webgate.ec.europa.eu/tracesnt/directory/publication/organic-operator/FR-BIO-01.250-0086123.2025.001.pdf>
 - Digitally signed PDF: <https://webgate.ec.europa.eu/tracesnt/directory/publication/organic-operator/digitally-signed/FR-BIO-01.250-0050665.2026.001.pdf>