

# **Application guidance for the “French Input List”**

**Overview of administrative procedures and  
requirements**

Version I; May 2025

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# I. Introduction

In this document we refer to the “French Input List” as the FiBL-ITAB guide of products that can be used in organic production in France.

This document provides guidance for companies on the administrative aspects of registering products in the “French Input List”. This document can be found on the website [france.inputs.eu](https://france.inputs.eu). It will be updated whenever necessary. Please refer always to the most recent version, which is available on the website, and which is the only valid version.

## Contact for French organic farmers

French organic farmers who have questions relating to the “French Input List” should contact ITAB.

**Address:** 149 rue de Bercy 75595 Paris Cedex 12. Further information and contact details can be found on the ITAB website [itab.bio](https://itab.bio).

## Contact for companies

Input manufacturers and traders who have questions relating to the “French Input List” should consult the website [france.inputs.eu](https://france.inputs.eu) or contact FiBL. Enquiries can be made in English or French.

**E-Mail:** [france@inputs.eu](mailto:france@inputs.eu)

**Postal Address:** FiBL, Ackerstrasse 113, 5070 Frick (CH). Further contact details can be found on [france.inputs.eu/submit-products](https://france.inputs.eu/submit-products).

## I.1 About the “French Input List”

The “French Input List” is a public online register of products usable in organic production in France generated in a co-operation between FiBL and ITAB. The “French Input List” is based on the EU organic legislation (Reg. (EU) 2018/848 and in particular Annex II to Reg. (EU) 1165/2021). In addition, the “French Input List” takes into account the legal requirements and official interpretations applying in France. These are described in the document ‘Admission Criteria for the French Input List’.

The “French Input List” unites two functions:

- It provides a system for thorough **evaluation**, which takes into account specific national aspects and is at the same time harmonized as much as possible with other European lists.
- It serves as an **online register** for organic farmers, certification bodies (CB) and other interested stakeholders.

## 1.2 About the project partners and their collaboration

The “French Input List” is produced in collaboration by ITAB and FiBL. ITAB is an applied research organisation whose aim is to produce and share knowledge to improve organic production and processing. For more information see [itab.bio](http://itab.bio). FiBL is a private research institute based in Switzerland with a long tradition of evaluating inputs and publishing input lists. For more information see [fibl.org](http://fibl.org).

The collaboration for the “French Input List” is organized in the following way: FiBL receives technical information on products from companies, carries out a technical evaluation and prepares a recommendation for ITAB. ITAB takes the final decision on inclusion of the product in the “French Input List”.

ITAB is assisted by an advisory board, which supports ITAB with specific technical knowledge.

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## 2. Overview of the application process

The table 1 below provides a short overview of the application process. More detailed explanations are given in the subsequent chapters.

| Steps to the first listing  |  | Details         |
|-----------------------------|--|-----------------|
| Step 1                      | The company (see 3.1) registers with FiBL and enters a secrecy undertaking.  | See section 3   |
| Step 2                      | The company submits information on a product.  | See section 4.1 |
| Step 3                      | FiBL prepares a technical recommendation. If the product raises concerns about its acceptability, FiBL discusses these concerns with ITAB.   | See section 4.2 |
| Step 3 A                    | <i>If the outcome of step 3 is that the product raises issues that are not adequately addressed in the existing admission criteria (this is done by ITAB), it may consult the Advisory Board. Once a new decision has been made, FiBL will update the evaluation criteria document.</i>  | See section 4.4 |
| Step 4                      | ITAB takes a decision about inclusion in the “French Input List”. In case of acceptance, the product is included in the “French Input List”. Products included in the first half of the year will be listed until 31 December of that year. Products included in the second half of the year will be listed until 31 December of the following year. | See section 4.2 |
| Step 4 A                    | <i>In case of rejection, the company can make a complaint. In this case, the product is re-evaluated as described in step 3. In case of confirmation of rejection, it won't be possible to make a new complaint</i>  | See section 4.3 |
| Step 5                      | FiBL invoices the evaluation fee to the company.   | See section 6   |
| Prolongation of the listing |  | Details         |
| Step 6                      | Once per year, FiBL asks the company to confirm the listing for the following calendar year. If confirmed, FiBL will prolong the listing and invoice the listing fee to the company.   | See section 5.4 |

**Table 1:** Overview of the application process.

## 3. Relationship between companies and FiBL

### 3.1 Distinction between distributors and other companies

Because the “French Input List” is produced for organic farmers, the database lists products in connection with the company that is selling to the end-users in France. Such companies are called ‘distributors’ in this guideline. Also manufacturers may be considered as distributors if they are selling the product to end-users in France

**The following general rules apply:**

- All distributors are required to register their company with FiBL, so that their product applications can be administered and their contact details can be shown in the “French Input List”.
- Companies which do not themselves sell inputs to end-users (manufacturers, authorised representatives or importers) may in general not register as distributors. FiBL may grant an exception on a case-by-case base, for example if
  - a.) the company can demonstrate a close connection to the French Input market
  - b.) or if the product can just be distinctively identified by the purchaser if the manufacturer’s name is related to it (e.g. if only the manufacturer’s name is printed on the product label).
- Companies which are not eligible for registration, (e.g. manufacturers, authorized representatives not distributing the product), may communicate with FiBL to provide technical information on a product. In such cases, FiBL is offering the companies to enter a secrecy undertaking.
- The first contact between FiBL and the manufacturing company, authorized company representative or similar, shall be established by the applicant (distributor), while any further exchange about the product details will be effected between FiBL and the manufacturing company or the authorized company representative exclusively.

Please note that companies which are not eligible for registration as distributors may nevertheless enter a secrecy undertaking with FiBL, if they have to supply technical information on a product (for details, see chapter 3.4).

In this guideline, distributors and other companies (manufacturers, authorised representatives and importers) are collectively called ‘companies’. The table below provides a short overview of the roles of distributors and other companies.

**Note:** If a company is at the same time manufacturer and distributor, the specifications for distributors apply.

| <b>Activities</b>  | <b>Distributors</b> | <b>Manufacturers not distributing the product, authorised representatives, importers</b> |
|--|---------------------|--|
| Register as a distributor  | yes                 | no*  |
| Shown in “French Input List”   | yes                 | no*  |
| Fees charged   | yes                 | no*  |
| Administrative correspondence with FiBL, including annual prolongation | yes                 | no*  |
| Submit product application   | yes                 | no*  |
| Covered by General Business contract                                   | yes                 | yes  |
| Enter secrecy undertaking  | yes, if required    | yes, if required   |
| Supply confidential data on composition / manufacture                  | yes, if known       | yes, if not known to the distributor   |

**Table 2:** Short overview of the roles of distributors and other companies.

\*exceptions may be granted as described in the text above.

## 3.2 General Business Contract

The General Business Contract specifies the rights and obligations of companies in relation to FiBL. Upon the companies' registration and/or application of a product for evaluation, the companies accept the General Business Contract FiBL has established for all of its input lists. The General Business Contract can be found on the website of the "French Input List". Among other provisions, the general business contract specifies the following:

- For all companies, FiBL is the only contact point with respect to the "French Input List".
- All correspondence between FiBL and the companies is done in English or French and all documents have to be submitted in one of the mentioned languages. German also accepted.
- Companies are obliged to provide complete and truthful information about their products. In case of severe violation of this principle, FiBL reserves the right to discontinue the collaboration with the company, and to de-list all its products.

## 3.3 Registration of companies (only for distributors)

As outlined under 3.1, only distributors may register for the "French Input List". The registration of distributors is to be done as follows:

- Download the «distributor registration form» from the "French Input List" website.
- Fill in the form electronically (no hand writing).
- Submit the signed form to FiBL by e-mail to the contact email address indicated on the form.

## 3.4 Secrecy undertaking (for all companies)

All companies which supply confidential information to FiBL (distributors, manufacturers, authorised representatives or importers) can enter a secrecy undertaking with FiBL. The secrecy undertaking is established between two parties, FiBL and the company providing confidential information on products. It covers the exchange of confidential information for an unlimited number of products of the company and hence does not have to be renewed for the exchange of information for new products submitted for evaluation. The secrecy undertaking mainly specifies the conditions of secrecy which will be applied by FiBL to all information covered by the secrecy undertaking in advance. In addition, FiBL will acknowledge the receipt of information for each product. **Note:** For some specific cases FiBL may request support from an external consultants with specific technical and general knowledge about the French organic and input sector, hereinafter referred to as 'national experts'. Such national experts are bound to confidentiality by a secrecy undertaking entered between the national expert and FiBL,



and hence has to respect the same secrecy precautions regarding the product information as FiBL outlines in its secrecy undertaking template.

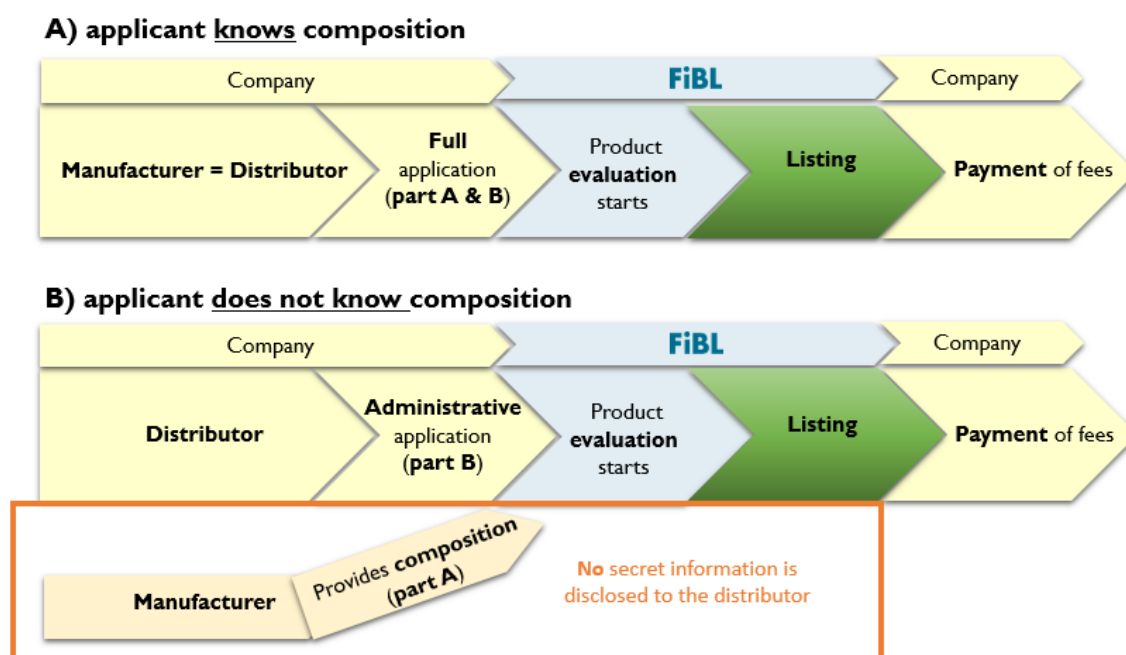
A secrecy undertaking is entered as follows:

- Download the form «secrecy undertaking» from [france.inputs.eu](http://france.inputs.eu)
- Fill in the company details electronically.
- Sign it, or alternatively add the digital signature.
- Send it to FiBL in PDF-format by e-mail.
- FiBL will countersign the agreement and return it to the company.

## 4. Product application and evaluation

### 4.1 Product application

Only companies registered as distributors (see 3.1) may submit products for evaluation. The application procedure for companies that have knowledge on the full composition/manufacturing process differs from the application procedure that do not know the full composition of their product (see fig. 1). Details are given in the following chapters.



### **Procedure for companies that have knowledge on the full composition of the product.**

The application procedure for **companies who have knowledge of the full product composition/ manufacturing process** is to be effected as follows:

- Download the appropriate product application form corresponding to the type of product category your product belongs to. There are separate forms for different product types.
- Complete **parts A & B** of the product application form electronically. Documents filled in hand-writing will not be accepted. All chapters of the document need to be completed.
- Sign the filled form and convert it into a PDF. Furthermore, please prepare all *supporting documents* and information as specified in the last chapter of the application form and include them into the product application package. All documents need to be submitted as PDF.
- Send the application form together with the *supporting documents* by Email to [france@inputs.eu](mailto:france@inputs.eu).

**Note:** FiBL requires to know the full product composition in all cases. If the applicant does not have such knowledge, he should indicate in the form from whom FiBL will receive this information.

### **Procedure for companies that do not know the full composition of the product.**

The application procedure **for companies who do not have knowledge of the full product composition/ manufacturing process** is to be effected as follows:

- Fill in part B of the application form including all the product-related information you can provide.
- For questions, which you cannot answer, indicate the company (manufacturer, authorised representative or importer) which in a second step will supply the complete information to FiBL.
- Send the completed and signed **part B** of the application form (PDF) to FiBL.
- Ask the company which has knowledge of the full composition to complete **part A** of the application form and to send it directly to FiBL. That company may enter a separate secrecy undertaking with FiBL for this purpose, as outlined in chapter 3.4. It is the responsibility of the applicant to take the necessary steps so that FiBL receives all information required for evaluation.

**Note:** In this procedure, FiBL will not disclose any confidential information, which it has received from third parties, to the applicant.

## 4.2 The product evaluation process

### Evaluation process

The product evaluation is carried out according to

- EU organic legislation (regulation 2018/848 and in particular Annex II of the implementing regulation 2021/1165, and successor regulations).
- French regulation and official guidelines related to the subject.
- the admission criteria for the “French Input List”.

In case the information provided by the company is not considered sufficient, FiBL may contact the company and ask for more detailed information on the product. When FiBL has received all required information, it will take a **decision whether the product complies with the relevant requirements**.

### Inclusion of compliant products into the “French Input List”

Products which were found to comply with the above mentioned legislation and evaluation criteria will be included in the “French Input List” during the next update.

### Inclusion with restrictions

The EU organic legislation imposes some restrictions / limitations for some materials. If a product contains such materials, these restrictions are therefore also adopted by the “French Input List”.

### Details of the listing layout

It is the intension of the “French Input List” team, to establish a level playing field for all products listed in the “French Input List”. For this purpose, all products are listed with the first letter in capital and the following letters in lowercase. The spelling of entire words in capital letters is not accepted (for abbreviations, the “French Input List” team may grant exceptions on a case-by-case basis). The use of special characters is limited. It is not possible to highlight trade names or other product related information (italics, underscores, bold type, colours etc.). Decisions about textual layout are in the sole responsibility of the “French Input List” team and may not be challenged by applicants.

## 4.3 Rejection

### Communication of the reasons for rejection

In the case of rejection, FiBL will send a letter to the applicant that outlines the reasons for rejection. Where applicable, this letter will also include information whether the product would be acceptable, if additional data were provided by the applicant.

In cases where the applicant does not know the composition of the product, it may not be possible for FiBL to communicate the precise reasons for rejection to the applicant for reasons of confidentiality. In such cases, FiBL may disclose relevant details to the institution that provided the respective information to FiBL.

### **Possibility for making a complaint in case of rejection**

If the applicant does not agree with the rejection of a product, he may submit a complaint to FiBL in writing. When submitting a complaint, the following points should be considered:

- A complaint should precisely refer to the reasons given in the rejection letter, and it should maintain a logical and structured argumentation line, elaborating why these reasons are not considered correct.
- Where appropriate, information supporting the argumentation (e.g. descriptions of manufacturing methods, analyses) should be included as annexes to the complaint.

Once FiBL has received a complaint, it will review the argumentation and discuss it with ITAB. Where necessary, the complaint will also be discussed with the advisory board of the “French Input List”. The applicant will be informed about the outcome of these discussions.

In case of confirmation of rejection, it won't be possible to make a new complaint

### **Product re-evaluations due to altered admission criteria**

The product admission criteria will evolve over time, for example due to revisions of the relevant EU legislation and national requirements. In certain cases, such changes may necessitate a re-evaluation of some product categories. Such changes may make the listing of a previously non-compliant product possible, or it may lead to de-listing of previously compliant products. Such situations will be discussed individually between FiBL and ITAB, and possibly also with the advisory board. The aim is to find an individually tailored solution which is legally correct and has minimal impact on French organic farming. Stakeholders will be informed at the earliest convenience. The information policy will be decided case by case.

## **4.4 Products requiring a decision by ITAB**

Product evaluation is based on the evaluation criteria, which are described in a separate document. These criteria are based on the relevant EU and national legislation. In cases where there is a margin of interpretation, FiBL will discuss the issue with ITAB and – if necessary – with the advisory board, and ITAB will take a decision, which specifies how the legislation is interpreted in a particular situation. FiBL will make sure that the identity of the product is not revealed during the discussions. Such decisions are taken in a general way, and are therefore valid not only for the product which has originally raised the question, but also for all future products which raise the same question. It is therefore foreseen that such decisions will be incorporated into an updated version of the evaluation criteria.

## **4.5 Quality assurance**

### **Supplementary investigations**

As part of the quality assurance procedures, a number of selected products from the “French Input List” will be submitted to supplementary investigations. In this context FiBL may perform a detailed follow-up, throughout which it may request additional information on a product, its composition, manufacturing process, its use etc. For some products FiBL may request analysis reports for specified parameters. If the analytical examination of a raw material used in a formulated product becomes necessary, the company must take responsibility to effect these analyses and provide the results to FiBL. FiBL may also request the re-submission of updated information on a specified product at any time. The company must react within due time as specified in the written request of FiBL.

### **Analytical spot-checking**

As a complementation of the companies’ efforts for quality control, FiBL will submit a certain number of products to analytical spot-checking. Product samples may be obtained on the market, or requested from the companies by FiBL. Analytical spot-checking is one central pillar of the quality assurance procedures.

### **Follow-up**

If the quality assurance procedures should reveal any irregularities, FiBL will assess the situation on a case-by-case basis, optionally also involving national experts and/or the advisory board. The applicant will be informed about the irregularity and asked to explain it. Depending on the situation, FiBL may provisionally suspend products from the “French Input List” until it has received sufficient information to explain the irregularities.

When all information is available, FiBL will take a decision whether the product can still be considered to be compliant with the admission criteria. FiBL will inform the company

about its decision. The company may make a complaint against this decision, as described in 4.3.

## 4.6 How to proceed when product characteristics change

All changes with relevance for the “French Input List” have to be communicated to FiBL by the applicant at the earliest convenience. For this purpose, the form ‘Changes of an existing entry’ (available in English only) has to be completed and sent to FiBL. Changes of a purely administrative nature are handled differently from changes in product composition, manufacturing or use.

### Changes of purely administrative nature

This category comprises changes, such as changes in

- product name, company name, contact person and contact details
- address, website information, legal structure etc.

The applicant is obliged to notify FiBL about such changes in time. Through the notification form ‘Changes of an existing entry’, the company must confirm that any change does not affect the composition of the product, and that the product still complies with the relevant EU and French legislation and applicable evaluation criteria for the “French Input List”. For products which are subject to mandatory registration any change of product or company name must be communicated also to the competent authority responsible for registration. FiBL will document such changes and modify the entry in the “French Input List” accordingly. In cases where such modifications might cause uncertainties among farmers, inspectors or other users the old trade and/or company name will be indicated next to the new trade and/or company name on the “French Input List” for a limited transition period (e.g. ‘product y, formerly called x’).

### Changes in product composition, manufacturing process or compliance with relevant legislation

This category comprises changes, which are **relevant for product evaluation**. They are therefore handled analogous to new product applications, as follows:

- The company submits the updated information, as described for new products (see 4.1) using the latest version of the application form provided on the “French Input List” website.
- Information, which remains unchanged, has to be clearly marked. Supporting documents only need to be re-submitted, if the information changed, compared to the documents handed in throughout the first application.
- FiBL will evaluate the changes and take the final decision about the inclusion to the “French Input List”.

## 5. Timelines

### The evaluation cycle

FiBL is working in so-called evaluation rounds. This means that

- Product applications can be submitted continuously.
- At certain 'evaluation dates' (communicated on the project website), all product dossiers which are ready for decision-making will be considered in one cluster. All compliant products of the cluster will be included simultaneously.
- Product applications which were submitted too late, or for which the documentation is incomplete at the evaluation date, will automatically be postponed for the next evaluation round by FiBL.

Each evaluation phase ends with the update of the "French Input List". At this moment all compliant products are published online. We advise companies to submit applications at least 6 weeks before the next update of the list.

### Timelines for new products

The information given in chapter 4.1 applies to products evaluated by FiBL.

- **Company registrations** and **secrecy undertakings** can be made any time of the year.
- **Product applications** can be made any time. However, they will be grouped by FiBL in clusters according to the evaluation rounds. Submit applications at least 6 weeks before the next list update.
- **Inclusion in the "French Input List"** occurs in clusters, at specific dates communicated on the project website.
- **Complaints** have to be submitted within 6 weeks after the company has received the official rejection letter from FiBL. The processing time for complaints may vary from case to case, depending on the complexity of the individual case.

### Validity of the first listing

Inclusions of new products occur at the end of each evaluation phase:

- If a product is included into the "French Input List" in the first half of the year, the first listing will be valid until the end of the *current* calendar year.
- If a product is included in the list in the second half of the year, the first listing will be valid until the end of the *following* calendar year.

### **Products withdrawn from the market**

In case that a product is not available on the market any more, the applicant is encouraged to inform FiBL. In order to protect organic farmers who have used the product in the current year or who have it on stock on their farm, it is not possible to withdraw a product's listing during the calendar year. However, FiBL may add a comment, indicating that the concerned product is not any more available.

### **Transitional period (grace period) for using up de-listed products**

When a product is removed from the "French Input List", FiBL may communicate a transitional period ('grace period'), during which French organic farmers may still use the product. Whether or not such a transitional period is established depends on the reasons for de-listing and will be determined by FiBL and ITAB on a case-by-case basis.

## **6. Fees**

The fees applicable for the evaluation and listing of products on the "French Input List" are published on the "French Input List" website.

### **Evaluation fee**

Companies are charged an evaluation fee for the evaluation of products against the admission criteria for the European and "French Input List". The evaluation fee applicable to product applications for the "French Input List" will be invoiced after the conclusion of each evaluation cycle.

The following general rules apply:

- The evaluation fee is due both, in case of listing and in case of rejection of the product.
- The evaluation fee covers the first listing. The evaluation fee is a fixed amount and covers the expenses related to product evaluation and includes the correspondence with the companies, examination of the documentation, background research etc.
- If a product is rejected and hence not included into the "French Input List", the company may re-submit the product for re-evaluation, if they can show that any shortcomings have been corrected. FiBL will charge the full evaluation fee for re-submitted products.
- If a product has to be re-evaluated because the product characteristics have changed, the evaluation fee is also charged.



### **Listing fee**

Once the prolongation of a product for another calendar year has been confirmed by the company, FiBL will charge a *listing fee* to the company:

- The listing fee covers those expenses related to the prolongation of the listing entry of the product, in particular the correspondence with the company and database settings.
- Quality control measures such as analytical spot-checking and all subsequent correspondence and inquiries are free of charge for the company.

### **No fees charged**

In the following situations, **no fees are charged**:

- Complaints: There is no fee for complaints.
- Purely administrative modifications of the listing, such as name changes and similar administrative modifications, are handled free of charge.
- Withdrawal of a listing entry: No fees will be charged for the withdrawal of a listing entry/ de-listing. However, if a product is withdrawn by the company or de-listed by FiBL during the year, the listing fee that has been paid for the ongoing calendar year will not be refunded.