

Application guidance for the Swedish Input List

**Overview of administrative procedures and
requirements**

Version I; September 2021

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I. Introduction

This document provides guidance for companies on the administrative aspects of registering products in the Swedish Input List. This document can be found on the website of the Swedish Input List Sweden.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 Swedish organic farmers

Swedish organic farmers who have questions relating to the Swedish Input List should contact KRAV. Enquiries can be made in Swedish.

Address: KRAV Ekonomisk förening, Box 1037, 751 40, Uppsala, Sweden. Further information and contact details can be found on the KRAV website www.krav.se.

Contact for companies

Input manufacturers and traders who have questions relating to the Swedish Input List should consult the Swedish Input List website sweden.inputs.eu or contact FiBL. Enquiries can be made in English or German.

Address: FiBL, Ackerstrasse 113, 5070 Frick (CH). Further contact details can be found on Sweden.inputs.eu/submit-products.

I.1 About the Swedish Input List

The Swedish Input List is a public online register of inputs generated in a co-operation between FiBL and KRAV in the name of the Swedish organic sector. The Swedish Input List is embedded in a series of national input lists which are united under the umbrella of the 'European Input List'. The Swedish Input List is based on the EU organic legislation (Reg. 834/2007, Reg 889/2008 and their successors) plus the implementation rules developed by the European Input List team (described in the document '[Basic Admission Criteria for the European Input List](#)'). In addition, the Swedish Input List takes into account additional criteria that apply only in Sweden. These are described in the document '[Supplemental Admission Criteria for the Swedish Input List](#)'. For further information, please visit the website of the Swedish Input List.

The Swedish 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 a comprehensive **online register** for organic farmers and certification bodies (CB).

1.2 Special features of the Swedish Input List

Organic farmers in Sweden

The great majority of organic farmers in Sweden are members of the private organization KRAV. These farmers must fulfil the production rules of the EU organic legislation as well as those of the KRAV standard. There are also some organic farmers who are not members of KRAV. These farmers must fulfil only the production rules of the EU organic legislation. In this document, these farmers will be referred to as 'EU certified organic farmers'. In consequence, the Swedish Input List contains two kinds of products:

- products that may be used on KRAV certified farms and on EU certified organic farms.
- products that may be used only on EU certified organic farms. These products are listed with a restriction stating that they may not be used on KRAV certified farms.

Certified and non-certified products

The EU legislation requires that feed materials of agricultural origin must be certified. In addition, the KRAV standard (www.krav.se/en/standards; chapters 4.8 and 12.1) requires that many types of composts and digestates as well as animal by-products must be certified.

All other products are not subject to mandatory certification. All the same KRAV offers the possibility that other fertilizers and plant protection products may be certified on a voluntary basis, so that the products can be labelled with the KRAV logo. For products which are neither required to be certified nor certified on a voluntary base, the Swedish Input List carries out an evaluation.

For the time being, the application procedure is as follows:

- **non-certified products:** From 15 September 2021 on, applications must be submitted to FiBL, as described in chapter 6.1 of this document.
- **certified products:** Applications must be submitted to a Swedish CB, as it was done prior to September 2021. For the convenience of the end-users, these products will be included in the public search tool of the Swedish Input List after they have been certified by the CB. Companies are advised that this transfer is effected by KRAV and FiBL, and companies should not contact FiBL concerning this.

1.3 Transition from the old system to the new Swedish Input List

In the past KRAV has been publishing a list of inputs that comply with the KRAV standard www.krav.se/en/standards. To facilitate the transition to the new system of the Swedish Input List, all products authorized for the mentioned 'old list', will be transferred into the Swedish Input List published by FiBL. However, due to the fact that these products have not been evaluated by FiBL for the Swedish Input List they are entitled to a provisional listing only. Hence they will disappear from the Swedish Input List after their validity date has expired. The respective validity dates can be viewed through the product search function of the Swedish Input List.

Companies wishing to keep their products listed also after the grace period has passed, shall submit their products for evaluation to FiBL on time (see chapter 6.2). In this way concerned companies have the opportunity to obtain regular listing on the Swedish Input List, without suffering any disadvantage from the system change. Even though such products are subject to a different timeline (see chapter 6.2), the evaluation is effected in the same way as for new products (see chapter 5.2).

2. Overview of the application process

This chapter describes the normal procedures for application and prolongation. For products which were transferred from the 'old list' into the Swedish Input List as part of the transitional measures, the procedures deviate slightly (see chapter 5.2).

2.1 Deciding where to apply

For the time being, FiBL evaluates only those products which are not subject to a certification requirement, and for which the company does not seek certification on a voluntary base. Therefore, the first step is to decide whether or not to apply with FiBL (see figure 1). Products subject to compulsory certification (A1) or products for which certification is sought on a voluntary base (A2) have to be applied with CBs, while products not subject to certification (B) have to be applied with FiBL.

- **A1 Compulsory certification:** Compost and digestate made from source-separated household waste, animal by-products or manure of factory farming origin; fertilizers containing animal by-products.
- **A2 Voluntary certification:** possible for all fertilizers and plant protection products.

The rest of this document exclusively describes the procedures in case of application with FiBL. For information regarding the application for certification with a CB, please contact the CB of your choice. Products certified by a CB may also be shown in the Swedish Input List, with a respective remark.

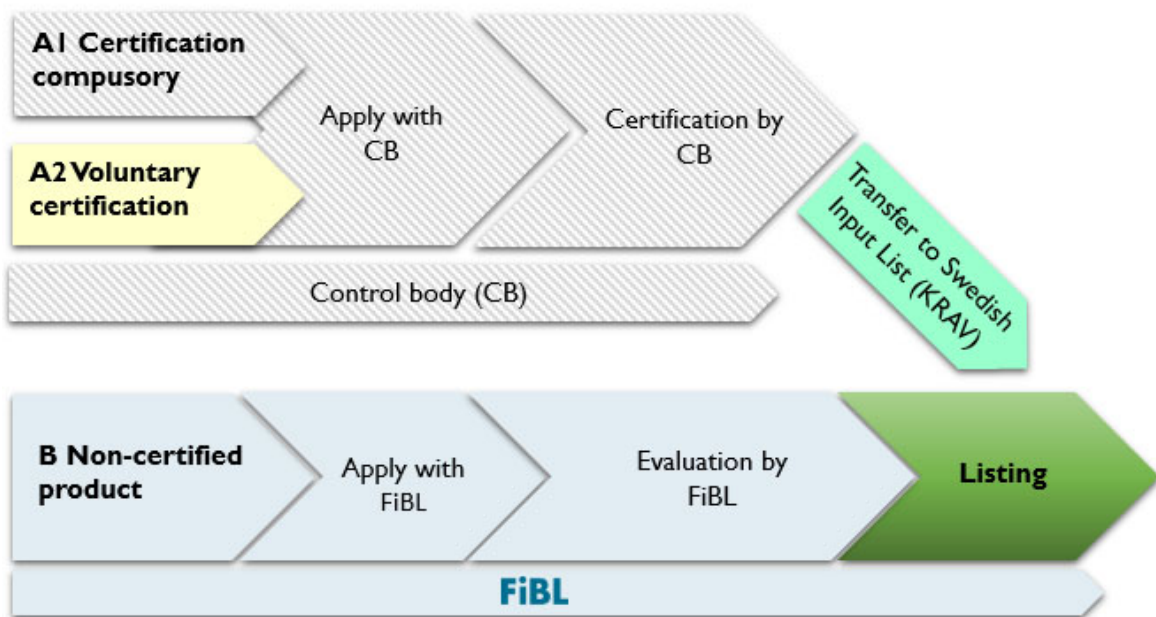


Figure 1: Deciding whether to apply with a CB (grey) or with FiBL (blue). Voluntary certification is decided by the company (yellow). Products certified by a CB may also be shown in the Swedish Input List, with a respective remark. Simplified figure, showing only the situation for positively evaluated / certified products.

2.2 Steps to the first listing

Figure 2 visualizes the main steps involved in the evaluation of a product. Details are given in the following chapters.

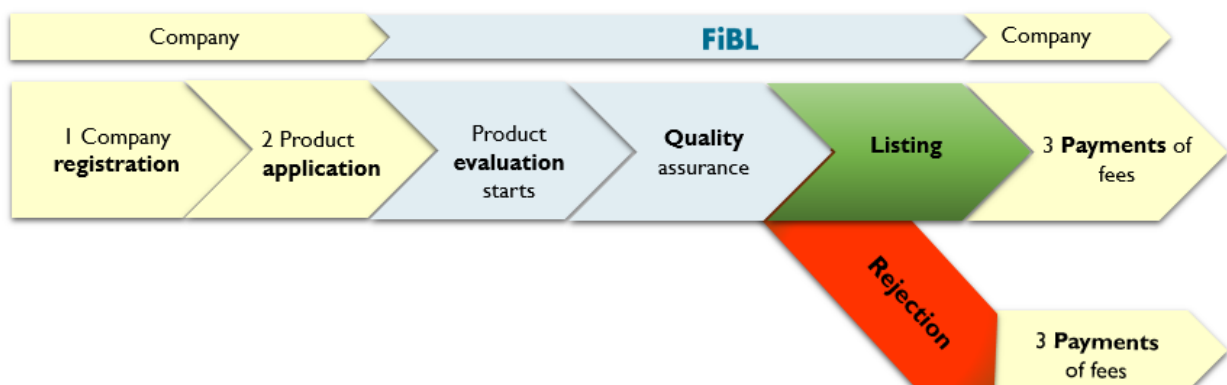


Figure 2: Main steps of the application process. Steps to be taken by the company are shown in yellow; steps by FiBL are shown in blue.

2.3 Steps for prolongation of the listing

Figure 3 visualizes the main steps that have to be taken to prolong the listing of a product, which is already included in the Swedish Input List. Details are given in the following chapters.

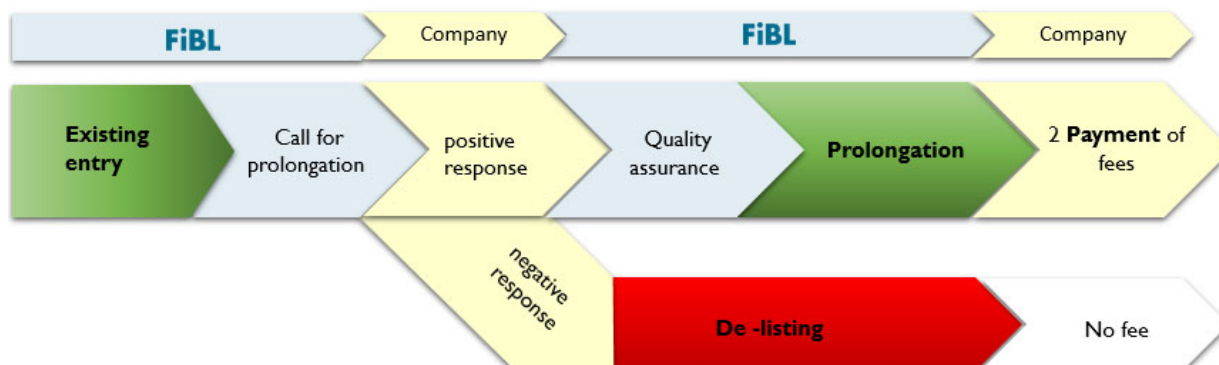


Figure 3: Main steps for prolongation of a product already listed.

3. Relationship between companies and FiBL

3.1 Distinction between distributors and other companies

Because the Swedish Input List is produced for organic farmers, the database lists products in connection with the company that is selling to the end-users in Sweden. 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 Sweden.

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 Swedish 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, if
 - a.) the company can demonstrate a close connection to the Swedish 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 effect the

correspondence 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.

Activities	Distributors	Manufacturers not distributing the product, authorised representatives, importers
Register as a distributor	yes	no*
Shown in Swedish 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 I: 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 with respect to the European Input List. The General Business Contract can be found on the [website of the European 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 Swedish Input List.
- All correspondence between FiBL and the companies is done in English or German and all documents have to be submitted in one of the mentioned languages.
- 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 4.1, only distributors may register for the Swedish Input List. The registration of distributors is to be done as follows:

- Download the «company registration form » from the project website.
- Fill in the form electronically (no hand writing).
- Sign it, or alternatively add the digital signature.
- Submit the signed form to FiBL in pdf-format by e-mail to the contact email address indicated on the Swedish Input List website.

Note: Please do not send any posted mails. Distributors who have many points of sale (retailers, such as garden centres, agricultural cooperatives etc.) are advised to contact FiBL in advance and ask for guidance on how to register.

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 certain cases FiBL may request support from an external consultants with specific technical and general knowledge about the Swedish 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 sweden.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 4.3) 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. 4). Details are given in the following chapters.

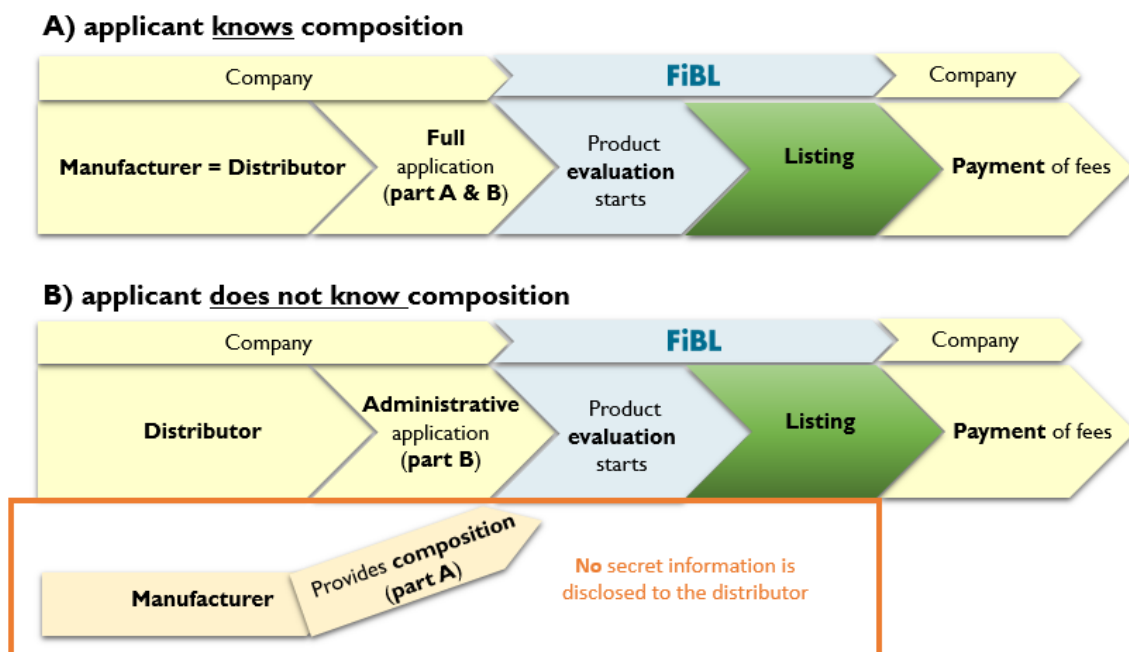


Figure 4 A & B: Procedure to be followed by companies having detailed information on product composition and manufacturing (A) and for companies not having such information.

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. For more detailed information on what form you should use, please consult the document “Which application form to use” (available in English only)
- 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 sweden@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 (see chapter 5.1.2).

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 4.4. 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

- the [Basic Admission Criteria](#) for the European Input List, based on the requirements of the EU organic legislation (regulation 834/2007 and implementing regulation 889/2008, and successor regulations)
- the supplemental admission criteria for the Swedish 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 Swedish Input List

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

Inclusion with restrictions

Certain products can only be included into the Swedish Input List with restrictions. There are two main reasons for 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 Swedish Input List.
- Some products may be used on 'EU certified organic farms' but not on KRAV certified farms. To prevent KRAV certified farmers from using such products, the products will be marked accordingly in the Swedish Input List.

Details of the listing layout

It is the intension of the Swedish Input List team, to establish a level playing field for all products listed in the Swedish 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 Swedish 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 Swedish 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 KRAV. Where necessary, the complaint will also be discussed with the advisory board of the Swedish Input List. The applicant will be informed about the outcome of these discussions.

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, national requirements or KRAV rules. In certain cases, such changes may necessitate a re-evaluation of certain 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 KRAV, 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 Swedish organic farming. Stakeholders will be informed at the earliest convenience. The information policy will be decided case by case.

4.4 Quality assurance

Supplementary investigations

As part of the quality assurance procedures, a number of selected products from the Swedish 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 certain 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 Swedish 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 5.2.1.

4.5 How to proceed when product characteristics change

All changes with relevance for the Swedish 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 legislation and applicable evaluation criteria for the Swedish Input List. For products which are subject to mandatory registration (e.g. plant protection 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 Swedish 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 Swedish 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 5.1) using the latest version of the application form provided on the Swedish 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 Swedish Input List, following the procedures outlined in chapter 4.2.

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 Swedish Input List. At this moment all compliant products are published online. Figure 4 visualizes the evaluation cycle. Relevant dates for companies are published in the Swedish Input List website.

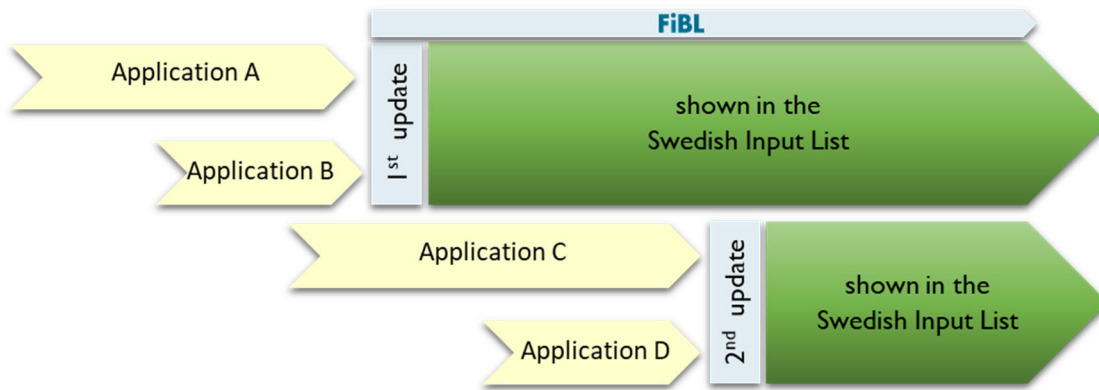


Figure 5: Overview of the evaluation cycle.

Timelines for new products

The information given in chapter 6.1 applies to products evaluated by FiBL. For products evaluated by third parties, information is given in chapter 6.2.

- **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 (see chapter 5.3).
- **Inclusion in the Swedish 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 Swedish 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.

Emergency situations

Products for which KEMI has granted a derogation for an emergency situation may be included in the Swedish Input List on short notice, outside the regular timelines described here. If a company expects such a derogation, it should notify FiBL in advance (as early as possible), in order to avoid delays after the KEMI derogation is published.

Products from KRAV's 'old list'

As specified in point 2, KRAV has been listing inputs ('old list') that comply with the KRAV standard. With the realisation of the Swedish Input List, the KRAV's old list has been suspended and the products listed have been transferred to the Swedish Input List:

- These listings are **provisional**.
- The expiry date from the 'old list' is taken over.
- All concerned products carry a note that they have not been evaluated by FiBL.

Conversion of provisional listings into regular listings

When FiBL receives an application for the provisionally listed products, it will evaluate it according to the standard procedure, as described here. Upon compliance of the product the provisional listing is converted into a regular listing. Companies may start this process as soon as the Swedish Input List goes online. In any case the application for regular listing must be made before the provisional listing expires.

Products certified by a Swedish CB

As mentioned in chapter 1.2 certain products are subject to mandatory or voluntary certification. Such products must not be submitted to FiBL but to a Swedish CB of choice.

For the convenience of the end-users, these products will be included in the public search tool of the Swedish Input List after they have been certified by the CB. Companies are advised that this transfer is effected by KRAV and FiBL, and companies should not contact FiBL concerning this.

Prolongation of existing entries

Except for products provisionally listed as evaluated by third parties, regular product listings expire at the end of a calendar year. Companies holding a regular listing on the Swedish Input List will be contacted by FiBL during summer – autumn and asked whether they wish to prolong the entry for another calendar year.

If an applicant does not respond to the call for prolongation, the listing of his products will expire.

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 products are not any more available.

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

When a product is removed from the Swedish Input List, FiBL may communicate a transitional period ('grace period'), during which Swedish 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 KRAV on a case-by-case basis.

6. Fees

The fees applicable for the evaluation and listing of products on the Swedish Input List are published on the [project website](#).

Evaluation fee

Companies are charged an evaluation fee for the evaluation of products against the admission criteria for the European and Swedish Input List. The evaluation fee applicable to product applications for the Swedish Input List will be invoiced after the conclusion of each evaluation cycle (see 5.3).

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 (see chapter 6.1). 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 Swedish 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.