Registration of Units in the Field, Record-Keeping and Registration Procedures for Economic Operators Engaged in the Import and Marketing of Fertilizing Products



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Purpose and learning objectives

A journey from operator pre-qualification to post-market control.

Understand

Distinguish operator licensing, product registration, customs identification and conformity assessment.

Apply

Follow the complete registration, import and market-entry process.

Record

Identify minimum evidence for imports, inventory, distribution, complaints and recalls.

Support

Identify where FAO can assist with policy, capacity, systems and regional cooperation.

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Why registration and records matter

Registration establishes market eligibility; records demonstrate continuing compliance.

QUALITY & SAFETY

Verify nutrient guarantees, contaminants, microbiological quality and truthful information.

TRADE

Create predictable requirements and reliable documents for legitimate cross-border movement.

TRACEABILITY

Connect product, batch, supplier, importer, warehouse, distributor and customer.

POLICY

Generate evidence for fertilizer markets, quality trends and sustainable nutrient management.

A credible system protects farmers while avoiding unnecessary burden on compliant operators.

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FAO normative and knowledge framework

The regulatory system forms part of wider soil governance and nutrient stewardship.

Fertilizer Code

Voluntary, locally adaptable recommendations for stakeholders involved in fertilizer use and management.

VGSSM

Technical and policy recommendations for sustainable soil management, including nutrient balance and contamination prevention.

SoiLEX

Global access to legal instruments on soil protection and prevention of soil degradation.

SoilFER

Soil information to guide policymaking and fertilizer recommendations at national and field scales.

These instruments provide policy context; national laws define binding registration and record obligations.

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A proposed framework for national systems

Five pillars link operator registration to inspection and enforcement.

1 | Operator registration

Who is responsible?
Register operators, units and premises

2 | Product conformity

What is the product?
Identity, quality, safety and labels

3 | Import and market control

How does it enter and circulate?
Authorization or notification; consignment checks

4 | Records and traceability

Where did it come from and go?
Batch records; one step back, one step forward

5 | Inspection and enforcement

Does it remain compliant?
Sampling, laboratory analysis, recall

6 | Core principle

Registration identifies responsibility; product requirements establish conformity; records provide evidence; traceability connects the supply chain.

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What exactly is being registered?

Four connected controls answer four different questions.

1. Legal entity

Who is the business and responsible person?

2. Operator / premises

What activities and establishments are authorized?

3. Product

Is the product registered, notified or demonstrated compliant?

4. Transaction records

What happened to each consignment and batch?



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Economic operators: duties follow roles

Every operator involved in import and marketing must be identifiable.

Production and preparation

- Manufacturer / producer
- Blender / formulator
- Packer / repacker

Trade and sales

- Importer
- Wholesaler / distributor
- Retailer / agro-dealer
- Online seller

Logistics and representation

- Warehouse / logistics operator
- Agent / representative

Each operator may run one or more field units.

Each unit should be registered against its operator.

When manufacturer-level duties may apply

If an importer or distributor markets under its own name, or modifies the product in a way that affects compliance, manufacturer-level duties may apply.

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Step 1 | Pre-qualification and operator licensing

Formal authorization comes before import, blending, distribution or marketing.

Business identity

Licence and commercial registration

Tax / company number

Responsible person

Authorized activities and product categories

Technical capacity

Premises, branches, depots and outlets

Trained staff and quality procedures

Complaint and recall plans

Suitable storage and inspection status



Licensing workflow

1 Application	2 Review	3 Authorization	4 Maintenance
Administrative screening	Premises and documents Inspection where required	Registration or licence	Update and renewal

Licence rules: validity, renewal, modification, suspension and cancellation.

Risk-based inspection priorities: importers, bulk warehouses, blenders and repackagers.

Output: unique operator number, approved activities and premises, and a validity period.

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Step 1A | Registration of units in the field

Step 1 licenses the operator. Step 1A registers operating locations where national law requires it.

One licence may cover a head office, warehouses and sales points.

Site records show where each batch was stored, repacked or sold.

Which units may need registration?

- Regional / branch offices
- Warehouses and depots
- Wholesale and retail outlets
- Blending, packing or repacking sites
- Mobile or temporary sales units, where regulated

Minimum establishment record

- Unique operator and site IDs
- Legal name and physical address
- Responsible manager and contacts
- Authorized activities and product categories
- Storage capacity and conditions

Lifecycle and oversight

- Application and document review
- Site inspection where required
- Approval and validity period
- Updates after relocation or activity change
- Renewal, suspension or cancellation

1 **Identify site** › 2 **Verify premises** › 3 **Assign site ID** › 4 **Link products & batches** › 5 **Inspect / update**

Batch traceability: every site linked to its legal operator

Every stock movement records the site of receipt, storage, dispatch or repackaging. Changes to sites or activities trigger a registry update.

National law determines which units need separate registration.

Next: product classification

Step 2 | Classify the product and regulatory route

Classification determines the authority, evidence package and market-entry pathway.

Mineral fertilizer
Urea or potassium chloride
Mineral nutrient sources

Organic fertilizer
Processed poultry manure
Biological nutrient source

Organo-mineral fertilizer
Organic fertilizer + mineral NPK
Combined nutrient sources

Soil improver
Mature green-waste compost
Improves soil properties

Liming material
Ground limestone
Corrects soil acidity

Growing medium
Coconut coir + perlite
Rooting substrate

Inhibitor
- **Nitrification inhibitor**
- **Urease inhibitor**

Biofertilizer
Rhizobium inoculant
Biological N fixation

Plant biostimulant
Seaweed extract
Claims need evidence

Product blend
Fertilizer + biostimulant
Combined product functions

Regulatory route depends on national law and the product's composition and claims

Registration
Pre-market dossier and decision

Notification
Defined information filed before sale

Standards route
Compliance with mandatory specification

Conformity assessment
Evidence against harmonized requirements

Illustrative examples. Classification and permitted uses depend on national law.
Biofertilizers may fall within plant biostimulants in some regulatory systems.

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Step 3 | Product technical dossier

The dossier should establish identity, quality, safety, performance and user information.

Identity & composition

Trade and generic name
Category and function
Nutrient guarantees
Constituent materials

Use & performance

Target uses and crops
Rate, timing and method
Claims and evidence
Restrictions



Manufacture & quality

Manufacturer and site
Process summary
Specifications and methods
Raw-material sources

Safety & presentation

CoA and contaminants
SDS where applicable
Label and packaging
Stability and shelf life

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Supporting documentation for imported products

Evidence should establish product identity, legal responsibility and consignment conformity.

Technical evidence

Certificate of Analysis
Product specification
Recognized analytical methods
Conformity / test reports

Market information

Approved label artwork
Packaging details
Instructions and warnings
Batch / lot format

Origin and authority

Manufacturer authorization
Free-sale or origin evidence where required
Registration / conformity certificate
Local representative mandate

Risk-specific evidence

Microbial identity and purity
Pathogen controls
Feedstock or by-product status
Biosecurity or environmental approvals

Document requests depend on national law and product characteristics.
Free-sale certificates and full toxicology packages are not universal.

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Risk-based regulation: proportionate to the product

Requirements scale with risk, but every product keeps a baseline of quality, safety, truthful information and traceability.

Standard mineral fertilizers

Standardized specifications, labelling and proportionate post-market surveillance

Micronutrient mixtures

Product specifications and quality controls

Organic / organo-mineral

Composition and contaminant controls appropriate to the source

Recycled nutrient products

Source, process and contaminant controls

Microbial products

Organism identity, viability, purity, contamination and safety information

Novel bio-based products

Proportionate safety, quality and performance evidence

4 questions to ask:

Is it legally a fertilizing product, or do waste and by-product rules apply?

Are biosecurity controls triggered?

Are the claims supported?

Which authority is competent?

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Step 4 | Regulatory review and decision

Decision options and a clear route from guidance to post-market follow-up.

Review route

01 Guidance

02 Submit

03 Completeness

04 Technical review

05 Testing / inspection

06 Decision

07 Certificate

08 Post-market

Decision options

Approve

Approve with conditions

Request more information

Reject with reasons and appeal rights

Transparency in every review

Publish fees, timelines and decision criteria.

Avoid generalized global fee ranges.

Transparent procedures improve predictability and consistent treatment.

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Common registration challenges and practical responses

The objective is credible control, not unnecessary administrative burden.

Divergent definitions

Map national categories and develop regional glossaries or aligned definitions.

High testing costs

Accept credible existing data where appropriate and strengthen regional laboratory networks.

Language barriers

Use bilingual forms and distinguish technical dossier language from end-user label language.

Limited capacity

Use checklists, risk triage, peer review, training and digital case management.

Weak transparency

Publish requirements, status, service standards, decisions and appeal procedures.

Innovative products

Create proportionate pathways for microbial, recycled and bio-based products.

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Step 5 | Import authorization and border control

Connect the operator, approved product and actual consignment before release.

Before shipment

- Operator and product status
- Supplier / manufacturer, label and pack
- Specifications and CoA

At entry

- Invoice and transport documents
- Origin papers, permits and checks
- Vessel / container and port

Border decision and handoff

- Release, quarantine or re-export
- Entry date and quantity
- Batch link and receiving registered unit

Customs identification does not replace product authorization

Apply additional biosecurity checks to organic, animal-derived, microbial or plant-origin products where relevant.

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Step 6 | Importer conformity gateway

Seven checks establish conformity before the product reaches the market.

Approval evidence

01 Manufacturer and site match approval

02 Composition and category match dossier

03 Registration or conformity remains valid

Shipment evidence

04 Label is accurate in required languages

05 Batch and CoA are available

06 Importer and packaging details are correct

07 Storage and transport preserved quality

When there is doubt

Withhold

Quarantine

Investigate

Notify as required

The importer is the national compliance gateway for foreign products.

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Step 7 | Distribution and batch-level traceability

One step backward, one step forward, plus internal stock movement.



SUPPLIER

Manufacturer / exporter

IMPORTER

Entry + product + batch

WAREHOUSE

Receipt + location + status

DISTRIBUTOR

Dispatch + customer

RETAIL / USER

Delivery + complaint link

Minimum keys: product • batch • quantity • date • supplier • customer • destination • invoice / delivery reference

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Essential records | Minimum evidence set

Records should be current, auditable, batch-linked and promptly retrievable.

Corporate & regulatory

Operator licence
Premises approval
Product certificates
Approved labels and SDS

Quality & technical

Specifications and CoA
Sampling and test reports
Conformity documentation
Production / repackaging records

Trade & logistics

Purchase order and invoice
Packing list and transport document
Customs and origin records
Receipt and dispatch documents

Post-market

Complaints and returns
Investigation and corrective action
Withdrawal / recall
Disposal or re-export

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Record-keeping matrix by operator

Indicative model: adapt to national legal responsibilities and risk profile.

Record category	Importer	Wholesaler	Distributor	Retailer	Manufacturer / blender
Operator registration	✓	✓	✓	✓	✓
Product conformity / registration	✓	✓	✓	✓	✓
Import documentation	✓	—	—	—	✓ if importing
Batch / lot traceability	✓	✓	✓	✓	✓
Supplier records	✓	✓	✓	✓	✓
Customer / sales records	✓	✓	✓	✓	✓
Production / blending records	—	—	—	—	✓

Everyone keeps registration, supplier, customer and batch records; import and production records follow the role.

Examples of information to retain

Registration: licence, number, premises | Supplier: identity, invoices, delivery notes
Customer: buyer, quantity, date | Batch: lot number, product, movements
Import: permits, customs records, certificates | Production: inputs, formulation, QC

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Practical tool | Minimum import register

Moldova-based example | Core stock fields plus import-notification details

Anexa nr. 1
la Regulamentul cu privire la importul,
comercializarea, stocarea şi utilizarea
produselor de uz fitosanitar şi a fertilizanţilor

Registrul
de evidenţă a importului, comercializării şi stocării produselor de uz fitosanitar şi a fertilizanţilor

Журнал
учета ввоза, реализации и хранения средств фитосанитарного назначения и средств, повышающих плодородие почв

Nr. crt. № п/п	Denumirea produsului de uz fitosanitar, fertilizantului Наименование средства фитосанитарного назначения средства повышающие плодородие почвы	Denumirea firmei producătoare Наименование Фирмы производителя	Sold la data de 01.01.200… (tone) Остаток на 01.01.200…	Cantitatea procurată Приобретенное количество				Cantitatea comercializată (tone) Реализованное количество (тонн)	Soldul la depozit la finele fiecărui trimestru (tone) Остаток на складе на конец каждого квартала (тонн)
				În total (tone) Всего (тонн)	Inclusiv: В том числе importată (tone) Импортировано (тонн)	numărul şi data declaraţiei vamale Номер и дата таможенной декларации	procurată de la agenţii economici pe teritoriul Republicii Moldova Приобретено у экономических агентов на территории Республики Молдова		
1	2	3	4	5	6	7	8	9	10

Data _____
Число

L.Ş
M.P.

Numele şi prenumele conducătorului _____
Фамилия, имя руководителя

Semnătura _____
Подпись

1. No. / Serial number
2. Name of plant protection product / fertilizer
3. Name of manufacturer / producing company
4. Opening stock as of 01.01.20… (tonnes)
5. Total quantity purchased (tonnes)
6. Including: imported (tonnes)
7. Customs declaration number and date
8. Purchased from economic operators in the Republic of Moldova
9. Quantity sold / marketed (tonnes)
10. Stock remaining in the warehouse at the end of each quarter (tonnes)

Document title:

Register for accounting of the import, sale and storage of plant protection products and fertilizers.

Illustrative, non-official template; verify compliance with current legislation.

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Warehouse, inventory and repackaging controls

Physical control and records must tell the same story.



RECEIVE	Verify quantity, packaging, label, batch and documents
LOCATE	Assign warehouse position and required storage conditions
SEGREGATE	Separate released, quarantined, returned and expired stock
REPACK	Link original batch to new packages and retain original information
RECONCILE	Opening stock + receipts − dispatches − losses = closing stock

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Record retention and data integrity

A five-year minimum is a practical benchmark for key traceability and compliance records.



Five-year core

Supplier/customer IDs, import, sales, batch, complaint and key compliance records.

Longer where required

Customs, tax, liability, environmental or product law may require longer retention.

Digital-label reference

EU digital-label information: ten-year accessibility from market placement from 1 May 2027.

Integrity controls

Role-based access, audit trail, backups, recovery and protection against alteration.

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Integrated digital registration and reporting

Start simple, use common identifiers and design for interoperability.

Operator registry

Identity, premises, licences, responsible persons and status

Product registry

Approved products, dossiers, labels and certificates

Import module

Permits, customs references, consignments and batches

Inspection & laboratory

Sampling, results, findings and corrective action

Traceability & reports

Inventory, transfers, sales and periodic regulatory reporting

Public verification

Product and operator status without exposing confidential information

Common identifiers: operator • establishment • product • consignment • batch • inspection • laboratory sample

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Non-compliance and recall management

The quality of records determines the speed and precision of the response.

1. DETECT	Complaint, inspection, sampling or authority alert
2. CONTAIN	Stop sale and quarantine affected stock
3. ASSESS	Confirm product, batch, hazard and distribution scope
4. NOTIFY	Inform authorities, suppliers and customers as required
5. CORRECT	Relabel, withdraw, recall, re-export or dispose
6. VERIFY	Reconcile quantities, check effectiveness and close

Target the affected batch, verified customers and accountable quantities.



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Responsibilities across the supply chain

Obligations follow role and may shift when a product is relabeled, repackaged or modified.

Manufacturer

- Compliant product
- Control inputs and process
- Technical documentation
- Corrective action

Importer

- Verify before import and sale
- Supplier and border evidence
- Identify the importer in market
- Withhold and report non-compliance

Distributor

- Exercise due care
- Protect storage and transport
- Customer and batch records
- Support withdrawal and recall

National authorities

Define procedures and coordinate customs, laboratories and surveillance. Binding decisions and enforcement remain national.

FAO supports guidance, capacity building and regional learning.

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International examples: what can countries learn?

Common building blocks, different institutional designs.

System	Operator / establishment	Product	Import / market control	Records / traceability
EU	Economic-operator duties	CE conformity / product requirements	Importer obligations + market surveillance	5-year supplier / customer identification
Canada	Registrant / responsible party	Pre-market registration for many products	Import + marketplace inspection	5-year records in specified cases
Brazil	Establishment registration	Product registration	Import authorization	Production / commercialization reporting
ECOWAS	Agro-dealer licensing	Regional quality framework	Prior import / export notification	Inspection, sampling, quality control
Australia	Entity / supply-chain registration for relevant imports	Risk-based import conditions	Pre-load and import controls	Detailed supply-chain documentation
USA / states	State licensing / registration	State product rules	State inspection and reporting	Varies by jurisdiction
FAO	Locally adaptable framework	Quality, safety and management principles	Country-specific implementation	Supports responsible fertilizer governance

Adapt locally. The FAO Fertilizer Code provides a voluntary framework.

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Strategic recommendations

Build a workable system that protects farmers and legitimate trade.

Register accountable operators

Mandatory, risk-based registration of operators and field units before import or marketing.

Track by batch

Connect imports, stock, transfers and business customers.

Retain core records

Use five years as a baseline unless law requires longer.

Audit by risk

Prioritize product risk, operator history, volume, complaints and test findings.

Build capacity

Train operators, reviewers, inspectors, customs and laboratories.

Converge regionally

Align definitions and evidence while preserving quality safeguards.

These are technical recommendations, not FAO legal requirements.
Phase implementation to national capacity.

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Minimum national regulatory package

Six components connect legal scope, market entry, traceability and control.

Legal definitions

Fertilizing products and economic operators

Operator registration

Registration or licensing of operators and establishments

Product conformity

Registration or conformity requirements proportionate to risk

Import control

Authorization or notification with consignment documents

Records and traceability

Mandatory batch IDs. Trace one step back and forward. Set minimum record categories and retention periods.

Control and digital

Inspection, sampling and lab procedures. Graduated enforcement, withdrawal and recall. Digital registry and data exchange roadmap.

Proposed package for national strengthening.
Implement in phases that match national capacity.

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Phased implementation roadmap

Start with legal clarity and minimum traceability, then deepen integration.

0–6 months Foundation

- Map laws and mandates
- Agree definitions and scope
- Adopt minimum forms and records

6–12 months Pilot

- Launch operator / product registers
- Train reviewers and inspectors
- Pilot risk-based audits

12–24 months Integration

- Connect customs and lab data
- Introduce alerts and recall procedures

24+ months Improvement

- Expand electronic reporting
- Strengthen regional data exchange
- Update rules and guidance

Advanced technology follows stable rules, identifiers and workflows.

Use inspection, complaint, trade and laboratory findings to keep improving.

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Key takeaways and discussion

Registration, trade controls, evidence and post-market action must operate as one system.

1. **Identify responsibility**
   Register operators, activities and premises.

2. **Establish product status**
   Use a risk-based registration or conformity route.

3. **Control legal entry**
   Connect importer, product and consignment.

4. **Trace every batch**
   Link receipt, storage, sale and customer.

5. **Prepare to act**
   Use records for audit, investigation and recall.

Discussion: Which improvement matters most in your countries?



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Selected official references

Verify country-specific obligations; the FAO Fertilizer Code is voluntary and does not replace national law.

FAO | International Fertilizer Code

Locally adaptable, voluntary framework for responsible fertilizer management.

https://www.fao.org/global-soil-partnership/Scientific-and-technical-support/networks/insoilfer/the-international-code-of-conduct-for-the-sustainable-use-and-management-of-fertilizersfood-and-agriculture-organization-of-the-united-nations226k-subscriberssubscribe/en

European Union | Regulation (EU) 2019/1009

Product conformity, economic-operator obligations and traceability.

https://eur-lex.europa.eu/eli/reg/2019/1009/2026-07-01/eng

Canada | CFIA T-4-131

Record-keeping requirements, responsible parties and specified five-year retention.

https://inspection.canada.ca/en/plant-health/fertilizers/trade-memoranda/t-4-131

Brazil | MAPA / SIPEAGRO

Registration procedures for fertilizer-sector establishments and products.

https://www.gov.br/agricultura/pt-br/assuntos/registro-de-produtos-e-estabelecimentos/fertilizantes-inoculantes-e-corretivos

ECOWAS | Fertilizer quality-control regulation

Regional framework for fertilizer quality control and market oversight.

https://ecowap.ecowas.int/media/ecowap/file_document/2012_Regulation_relating_to_fertilizer_quality_control_EN.pdf

Australia | DAFF: Chemical and mined fertiliser

Import conditions and updated inorganic-fertiliser policy effective 30 April 2026.

https://www.agriculture.gov.au/import/goods/fertiliser/chem-mined

Requirements vary by jurisdiction. Confirm current national legislation, amendments and competent-authority guidance before applying examples.

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Verify country-specific obligations; the FAO Fertilizer Code is voluntary and does not replace national law.

FAO | International Fertilizer Code

Locally adaptable, voluntary framework for responsible fertilizer management.

https://www.fao.org/global-soil-partnership/Scientific-and-technical-support/networks/insoilfer/the-international-code-of-conduct-for-the-sustainable-use-and-management-of-fertilizersfood-and-agriculture-organization-of-the-united-nations226k-subscriberssubscribe/en

European Union | Regulation (EU) 2019/1009

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ECOWAS | Fertilizer quality-control regulation

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Thank You for Your Attention