



EUROPEAN  
COMMISSION

Brussels, 16.12.2025  
SWD(2025) 424 final

## COMMISSION STAFF WORKING DOCUMENT

*Accompanying the document*

### **Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**

**amending Regulation (EU) 2018/848 as regards certain production, labelling and certification rules and certain rules on trade with third countries**

{COM(2025) 780 final}

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## I. INTRODUCTION

Organic farming is a key element of the European Union's common agricultural policy (CAP). The share of land farmed organically has been growing steadily to currently around 11%. Consumers increasingly choose to buy organic food, recognisable through the logo on organic production of the European Union. The rules on organic farming are laid down in Regulation (EU) 2018/848 on organic production and labelling of organic products ('the basic Regulation')<sup>1</sup>, applicable since January 2022, and in various delegated and implementing Regulations adopted on the basis of that Regulation. These rules set the strict requirements that underpin organic production to ensure a high standard of environmentally sustainable agricultural production.

In February 2025, the Commission adopted 'A Vision for Agriculture and Food'<sup>2</sup> which set out a pathway for EU actions towards achieving an attractive, competitive, resilient, future-oriented and fair agri-food system for current and future generations of farmers and agri-food operators. The document called for reducing unnecessary burdens on the farming sector and the entire agri-food value chain as a key step towards boosting their competitiveness. The focus on simplification and boosting EU competitiveness is in line with President von der Leyen's Political Guidelines for 2024-2029 Commission mandate, and the Commission's broader commitments under the communications entitled 'Competitiveness Compass' and 'A simpler and faster Europe'.

To pursue these goals, in 2025 DG AGRI consulted Member States and stakeholders on Regulation (EU) 2018/848 and the delegated and implementing Regulations adopted on its basis (EU organic regulatory framework), to look at their impact on competitiveness and assess whether there was scope for simplification. The resulting review of some aspects of the basic Regulation will help make the rules more effective and easier to implement, while at the same time maintaining the objectives, principles and high standards of the current rules. This targeted review is complemented by the stocktaking of the associated delegated and implementing Regulations, also aimed at identifying potential areas of simplification, provided for in the roadmap for simplifying the CAP legal framework<sup>3</sup>.

This staff working document accompanies the Commission's proposal for amending Regulation (EU) 2018/848 and provides an estimate of costs and benefits expected to result from the measures proposed. Costs and benefits are quantified where the available data allows this; elsewhere, a qualitative assessment is provided. The available figures are summarised in Annex I to this document.

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<sup>1</sup> Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007 (OJ L 150, 14.6.2018, pp. 1-92, ELI: <http://data.europa.eu/eli/reg/2018/848/oj>).

<sup>2</sup> Commission Communication 'A Vision for Agriculture and Food Shaping together an attractive farming and agri-food sector for future generations', COM(2025) 75 final.

<sup>3</sup> Roadmap for simplifying the CAP legal framework to reduce burden on farmers and national administrations <https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/5ce7e50b-ef31-40e4-8ba3-be0c1696a062/download>.

Annex II to this document lists various points raised by Member States and stakeholders in the context of the consultation strategy (see Section 2) that have not been included in the proposal, explaining the reasons for this.

## 2. CONSULTATION STRATEGY

### *Feedback from expert and civil dialogue groups*

The Commission regularly exchanges information with Member States through the Group of Experts (GREX) on organic production, which meets on average six times a year, and with stakeholders through the Civil Dialogue Group (CDG) on organic farming, which usually meets twice a year. In these meetings, the Commission gathers views on various aspects of the implementation of Regulation (EU) 2018/848 and the delegated and implementing Regulations adopted on its basis.

In 2024, the Fit For Future platform, the high-level expert group set up to help the Commission simplify existing legislation and reduce the administrative burden, issued an opinion on how Regulation (EU) 2018/848 and the delegated and implementing Regulations adopted on its basis<sup>4</sup> could be simplified. The group proposed ways to enhance transparency and streamline the EU organic regulatory framework, while safeguarding organic market integrity. It also stressed that it was necessary to speed up harmonisation and simplification to achieve agreed policy objectives. Issues identified by the platform and addressed with this proposal are notably the complexity of a list of substances authorised for cleaning and disinfection, and requirements for animal husbandry. The opinion was discussed at the AGRIFISH Council meeting of 27 January 2025.

The Commission consulted the GREX and CDG in the first half of 2025 to follow up on the opinion of Fit For Future. It was concluded that some elements of Regulation (EU) 2018/848 and the delegated and implementing Regulations adopted on its basis could be simplified.

Furthermore, on 24 September 2025, a combined GREX-CDG meeting was held to discuss how Regulation (EU) 2018/848 could be simplified without weakening its objectives, principles or standards. The key points raised in that meeting concerned:

- the need to simplify Regulation (EU) 2018/848 and the delegated and implementing Regulations adopted on its basis to remove unnecessary burdens;
- promotion of organic products as a way to stimulate demand in a context of market volatility;
- research and funding as key drivers for the development of organic farming; and
- the need to develop and reinforce supply chains of organic products.

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<sup>4</sup> FIT FOR FUTURE Platform Opinion [https://commission.europa.eu/document/download/25d40cdf-9e5e-4a8b-8da6-7a72efad04ed\\_en?filename=fo\\_2024\\_8\\_organic\\_production\\_and\\_labeling\\_en.pdf&prefLang=mt](https://commission.europa.eu/document/download/25d40cdf-9e5e-4a8b-8da6-7a72efad04ed_en?filename=fo_2024_8_organic_production_and_labeling_en.pdf&prefLang=mt).

The Commission received additional feedback after that meeting on which aspects of Regulation (EU) 2018/848 and the delegated and implementing Regulations adopted on its basis could be simplified.

#### *Feedback from the implementation dialogue on the organic policy*

An implementation dialogue on the organic farming policy<sup>5</sup> was held on 10 November 2025, chaired by the Commissioner for Agriculture and Food and attended by several organic agri-food operators and other stakeholders. Discussions focused on their experience of the rules on organic production and the labelling of organic products and how certain aspects of Regulation (EU) 2018/848 and the delegated and implementing Regulations adopted on its basis could be simplified. The attendees also shared their experience of and views on the action plan for the development of organic production<sup>6</sup>.

As regards Regulation (EU) 2018/848, there was concern about the expiry of the recognitions of 11 third countries under the equivalence scheme, with attendees urging that the date of expiry be postponed. Moreover, they suggested simplifying the rules on groups of operators to facilitate the adherence to the system of small-scale farmers, particularly in third countries. Other aspects they felt should be adapted included the rules on products and substances for cleaning and disinfection, the withdrawal period after the use of veterinary medicinal products, the size of poultry houses and production units, as well as the derogation from the use of non-organic protein feed. The attendees also called for further harmonisation on the implementation of the rules on the presence of non-authorised substances. They broadly agreed on the importance of stability and giving farmers a long-term perspective, and on the need to run information campaigns to educate the public on organic farming policy and the organic production logo.

#### *Feedback from the call for evidence*

A call for evidence was held from 21 October to 18 November 2025.<sup>7</sup> A total of 720 submissions were received from EU citizens (44.9%), companies/businesses (31.3%), business associations (11%), Non-Governmental Organisations (NGOs) (2.8%), public authorities (1.5%), trade unions (1.3%), and others (7.4%). The feedback concerned possible amendments to Regulation (EU) 2018/848 and the delegated and implementing Regulations adopted on its basis.

Most submissions came from France (45.1%), Germany (21.5%), Austria (16.1%), Belgium (4%) and Sweden (3.2%). Detailed statistics are provided in Annex III to this document. The main feedback is summarised below:

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<sup>5</sup> [https://agriculture.ec.europa.eu/media/events/implementation-dialogue-eu-organic-policy-2025-11-10\\_en](https://agriculture.ec.europa.eu/media/events/implementation-dialogue-eu-organic-policy-2025-11-10_en).

<sup>6</sup> [https://agriculture.ec.europa.eu/farming/organic-farming/organic-action-plan\\_en#legal-basis](https://agriculture.ec.europa.eu/farming/organic-farming/organic-action-plan_en#legal-basis).

<sup>7</sup> [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/15273-Organic-production-targeted-updates-and-simplification\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/15273-Organic-production-targeted-updates-and-simplification_en).

- **Maintaining the high standards of Regulation (EU) 2018/848:** Respondents (mainly citizens from France), stressed the importance of preserving core organic farming principles such as the use of natural inputs, the ban of genetically modified organisms and new genetic techniques, and the emphasis on animal welfare and soil health. They expressed concern that an amendment of the rules would water down the standards on which the credibility of the organic production logo of the European Union relies, and consumer trust depends. Respondents also highlighted the need to prevent adverse effects of the ruling of the Court of Justice of the European Union in Case C-240/23 Herbaria II on the current equivalence trade scheme. Some others, mainly organisations and individuals, expressed opposition to the overall concept of equivalence and called for a more distinguished labelling of non-EU organic products.
- **Simplifying administrative and technical aspects:** Some respondents, in particular operators and business organisations, called for more flexibility and for practical adjustments to reduce the administrative burden, which currently affected the economic viability of organic farming. Among other things, this concerned cleaning and disinfection products used in processing and storage operations, requirements on groups of operators and the handling of residues in organic products.
- **Addressing challenges in organic livestock farming:** Respondents (mainly citizens and stakeholders from Germany and Austria) highlighted issues related to organic livestock production, such as the withdrawal period following the use of veterinary medicinal products and the availability of organic protein sources in view of the 100% organic feed requirement for poultry and pigs as from 2027. Other requirements that posed a challenge included access to open air areas for young poultry, the maximum usable area for fattening poultry in poultry houses of any production unit, indoor and outdoor area requirements for pigs, the covering of outdoor areas and, finally, grazing requirements for dairy cattle. Respondents called for the rules to be adjusted to ensure a more practical implementation of Regulation (EU) 2018/848 with regard to livestock, while maintaining current animal welfare objectives.

### 3. ISSUES AT STAKE, PROPOSED MEASURES AND EXPECTED IMPACTS

This proposal contains targeted adjustments related to: (i) products and substances for cleaning and disinfection in processing and storage facilities; (ii) the labelling of products from equivalent third countries; (iii) the conditions for exempting smaller operators selling unpacked organic products other than feed from the obligation of being in possession of a certificate pursuant to Article 35(1) of Regulation (EU) 2018/848; (iv) requirements as regards the composition of groups of operators and their members; (v) postponement of the expiry of the recognition of third countries for the purposes of equivalence under Article 33(2) of Regulation (EC) No 834/2007; (vi), setting a conversion period and a minimum age at slaughter for quails for meat production; (vii) the withdrawal period after treating livestock with veterinary medicinal products; (viii) conditions for access to open air areas for poultry; and (ix) poultry houses per production unit for fattening poultry. Details are provided in this section.

The proposal is expected to have a positive impact on the EU organic farming sector, benefiting farmers, businesses and consumers alike, as well as Member States administrations. It will not only simplify certain provisions of Regulation (EU) 2018/848 but is also expected to reduce costs, lighten the administrative burden and, as a result, stimulate investments. It will contribute both to further developing organic farming and to creating jobs, in particular in rural areas. The economic impact is presented in this section while Annex I summarises the key economic figures.

It should be noted, however, that any quantitative estimates of environmental and social impacts are subject to limitations, including a lack of standardised metrics. Actual outcomes will depend, first and foremost, on potential synergies and on the extent to which operators in the organic farming sector make use of the proposed measures. A qualitative assessment is therefore presented in section 4.

It is important to note that the positive impacts are being achieved while maintaining the principles and high standards of EU organic production.

### ***3.1. Products and substances for cleaning and disinfection in processing and storage facilities***

Regulation (EU) 2018/848 provides that products to clean and disinfect processing and storage facilities used in organic production must be authorised and included in restrictive lists. However, the drawing up of such lists poses a number of challenges. Those challenges have been confirmed by several reports from the Expert Group for Technical Advice on Organic Production (EGTOP)<sup>8</sup>.

First, there are numerous products and substances available on the EU market that can be used to clean and disinfect processing and storage facilities in keeping with the EU food safety and hygiene standards.

Second, organic products are processed and stored in many different types of establishments, involving the use of a wide range of equipment, machinery and buildings.

Third, any equipment and machinery used for processing and storage must be cleaned and disinfected as specified by the manufacturer to ensure correct operation and maintenance. The technical nature of such products and substances, regulatory requirements on chemical products and their many different uses and the constant arrival of new products on the market mean that it is technically challenging to lay down EU-wide criteria for the use of such products in organic production, draw up corresponding lists of products and keep the lists up to date.

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<sup>8</sup> EGTOP, ‘Final report on the criteria for evaluation of products for cleaning and disinfection’, 8 December 2021, [https://agriculture.ec.europa.eu/document/download/2cd40421-9a7e-432c-9818-947cc97358c4\\_en?filename=egtop-report-on-criteria-cleaning-and-disinfection\\_en.pdf](https://agriculture.ec.europa.eu/document/download/2cd40421-9a7e-432c-9818-947cc97358c4_en?filename=egtop-report-on-criteria-cleaning-and-disinfection_en.pdf); EGTOP, ‘Final report on cleaning and disinfection (III)’, 14 April 2025, [https://agriculture.ec.europa.eu/document/download/bc0480a6-d269-468b-97df-3da3216f0d4d\\_en?filename=final-report-egtop-on-cleaning-disinfectant-iii\\_en.pdf](https://agriculture.ec.europa.eu/document/download/bc0480a6-d269-468b-97df-3da3216f0d4d_en?filename=final-report-egtop-on-cleaning-disinfectant-iii_en.pdf); EGTOP, ‘Final report on cleaning and disinfection (IV)’, 6 November 2025, [https://agriculture.ec.europa.eu/farming/organic-farming/co-operation-and-expert-advice/egtop-reports\\_en](https://agriculture.ec.europa.eu/farming/organic-farming/co-operation-and-expert-advice/egtop-reports_en).

Any restrictive lists of the products and substances that can be used to clean and disinfect in processing and storage facilities place a burden on **operators handling organic products**. Operators who process and store organic products in the same processing and storage facilities as non-organic products, keeping with the parallel production requirements laid down in Regulation (EU) 2018/848, face increased costs because they have to buy different products and substances for organic and non-organic production and store them separately. They also face higher costs for cleaning and disinfection to be able to meet mandatory EU food safety and hygiene standards.

It is therefore proposed to repeal Article 24(1)(g) of Regulation (EU) 2018/848, to simplify the current rules and allow operators to use any products and substances available on the market that are suited to cleaning and disinfecting processing and storage facilities for use in organic production. This will also reduce the cost of complying with the applicable food safety and hygiene standards for all EU operators.

EU food and feed processors<sup>9</sup> of organic products spend a total of EUR 68.8 million annually on professional cleaning products and disinfectants in the sectors of agriculture, food and beverages<sup>10</sup>. Restrictive lists of products that can be used in the processing of organic products will likely double those costs due to the higher cost of inputs<sup>11</sup>. Repealing the requirement of restrictive lists could therefore avoid adjustment costs for these **businesses** (in processing and storage) of EUR 68.8 million annually.

### ***3.2. Requirements for use of the terms referring to organic production and EU organic production logo on products from equivalent third countries***

In Case C-240/23 Herbaria Kräuterparadies II<sup>12</sup>, the Court of Justice of the European Union (ECJ) ruled that Regulation (EU) 2018/848 must be interpreted as meaning that a product imported from a third country whose organic production and control systems have been recognised as equivalent to those of the EU, either through an international agreement between the EU and those third countries or where the third countries were recognised for the purpose of equivalence under Regulation (EC) No 834/2007, may not have on its labelling either the organic production logo of the European Union or, in principle, terms referring to organic production. The ECJ further ruled that the use of the organic production logo of the third country from which such product comes should be permitted on the product, even where that logo contains terms identical to those referring to organic production, within the meaning of Article 30(1) of that Regulation (EU) 2018/848 and Annex IV thereto.

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<sup>9</sup> Eurostat, 2023: <https://ec.europa.eu/eurostat/web/products-key-figures/w/ks-01-24-000>; FEFAC, 2024: <https://fefac.eu/statistics/>; Farms and farmland in the European Union - statistics - Statistics Explained - Eurostat; OPTA, 2024: <https://opta-eu.org/about-organic/organic-in-numbers/>.

<sup>10</sup> AISE, 2024: <https://aise.eu/priorities/cleanliness-hygiene/professional-cleaning/food-and-beverage/>

<sup>11</sup> Based on organic stakeholders' expert judgement.

<sup>12</sup> Judgement of 4 October 2024, Herbaria Kräuterparadies II GmbH / Freistaat Bayern Case (C-240/23) ECLI:EU:C:2024:852.

The use for a product imported from a third country whose organic production and control systems has been recognised as equivalent to those of the EU of the organic production logo of a third country is not liable to harm fair competition within the internal market in organic products or to give rise to ambiguity that may mislead consumers. This is because such a logo neither places the product concerned on the same level as EU organic products from the point of view of competition or is liable to give the impression that the product concerned complies with all the requirements laid down by Regulation (EU) 2018/848.

Terms referring to organic production, including their derivatives and diminutives, are used both in the EU and in third countries to suggest to the purchaser that the product and its ingredients have been produced in accordance with applicable organic production methods. This is also the case in the Codex Alimentarius guidelines CAC/GL 32<sup>13</sup>, where terms referring to organic production methods such as ‘organic’, ‘biological’, ‘ecological’ or words of similar intent including diminutives are used to suggest to the purchaser that the product or its ingredients were produced in accordance with organic production methods. In addition, certain organic production rules in third countries require terms referring to organic production to be used for products and their ingredients product that have been produced in accordance with applicable organic production methods. Not every third country whose organic production and control systems have been recognised as equivalent to those of the EU has its own organic production logo. Consequently, if products from such third countries could not bear terms referring to organic production, this would deprive operators in those third countries of the possibility to indicate the organic status of such products and to suggest to consumers in the EU that those products originate from organic production and are produced in accordance with organic production methods in their countries of origin. This would also be difficult to reconcile with the Codex Alimentarius guidelines CAC/GL 32 because it would not be possible to refer to organic production methods in the labelling of such products despite them meeting all the corresponding conditions set out in these guidelines. Those products should therefore be allowed to bear terms referring to organic production for the purpose of putting those products on the EU market as organic products.

The recognition of the organic production and control systems of a third country as equivalent to those of the EU means that such a system has been assessed as meeting the same objectives and principles as those of the EU by applying rules which ensure the same level of assurance of conformity, even if that is achieved through different means. Differences between the rules applied in organic production and control systems of third countries recognised as equivalent and those applied in the EU are intrinsic to the equivalence regime. The assessment of equivalency by the Commission has shown that while some of those differences are limited in scope, other differences involve rules of organic production which play an important role in the structure of organic production in the EU and contribute to achieving the objective of satisfying consumer expectations as regards organic products whilst ensuring fair competition

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<sup>13</sup> Guidelines for the production, processing, labelling and marketing of organically produced foods GL 32–1999: [https://www.fao.org/input/download/standards/360/cxg\\_032e.pdf](https://www.fao.org/input/download/standards/360/cxg_032e.pdf).

within the internal market. Those rules include living soil, animal welfare standards and processing of food using minimum artificial inputs.

A Eurobarometer survey<sup>14</sup> conducted in June and July 2024 and entitled ‘Europeans, Agriculture and the CAP’ indicated that the organic production logo of the European Union is the food product logo of which Europeans are the most aware. It is essential to both consumers and producers because it makes it easier for consumers to identify organic products and helps producers to market them across the Union.

In order to ensure a level playing field between products that fully comply with EU production and control rules and those that comply with rules equivalent to those EU rules, and in order to respond to consumer expectations that products imported from third countries whose organic production and control systems have been recognised as equivalent to those of the EU meet standards as high as those of the EU, the use of the organic production logo of the European Union should be allowed in the labelling, presentation and advertising of products imported from those third countries, provided that, in addition to those equivalent rules, those products comply with certain additional production and control requirements.

To preserve the effectiveness of Regulation (EU) 2018/848 as regards trade with third countries, such additional requirements should correspond to production and control rules that play an important role in the structure of organic production in the EU and contribute to achieving the objective of satisfying consumer expectations as regards organic products whilst ensuring fair competition within the internal market.

Operators in the Union that produce organic food and feed rely on the use of ingredients imported from third countries whose organic production and control systems have been recognised as equivalent to those of the Union. Such ingredients are used in variable proportions during the processing of organic products in the Union and are necessary for a large variety of organic products processed in the Union.

Processing operations in the Union, when using those ingredients, take place in compliance with the production rules set out in Regulation (EU) 2018/848. The use of the organic production logo of the European Union should therefore be allowed by products processed in the Union and that contain organic ingredients either produced in accordance with this Regulation or imported from third countries whose organic production and control systems have been recognised as equivalent to those of the Union and where those ingredients account for 5% or less of the agricultural ingredients of the product (by weight for food and in general for feed). Where those ingredients account for more than 5% of the agricultural ingredients of the product by weight (by weight for food and in general for feed), and in order to ensure a level playing field between processed products containing ingredients that fully comply with Union production and control rules and those that comply with rules equivalent to those Union rules, and in order to respond to consumer expectations that processed products containing ingredients imported from third countries whose organic production and control systems have been recognised as equivalent to those of the Union meet standards as high as those of the

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<sup>14</sup> <https://europa.eu/eurobarometer/surveys/detail/3226>.

Union, the use of the organic production logo of the European Union should be allowed in the labelling, presentation and advertising of processed products containing ingredients imported from those third countries, provided that, in addition to those equivalent rules, those ingredients comply with certain additional production and control requirements. As the use of the organic production logo of the European Union is obligatory for all organic prepacked food produced within the Union, it is therefore necessary to exclude from that obligation prepacked food produced within the Union with ingredients imported from third countries whose organic production and control systems have been recognised as equivalent to those of the Union and where those ingredients account for more than 5% of the agricultural ingredients of the product by weight and do not comply with certain additional production and control requirements.

The proposed measure amends Article 30 of Regulation (EU) 2018/848, to allow the use of terms referring to organic production on organic products imported in the EU from third countries recognised for the purpose of equivalence. This will ensure that no disproportionate barrier hampers the marketability of such products. The measure also amends Article 33 of Regulation (EU) 2018/848, to lay down those additional requirements, corresponding to production rules, that are of significance in the overall structure of organic production in the EU for their contribution to ensuring fair competition and the proper functioning of the internal market in organic products and maintaining and justifying consumer confidence in products labelled as organic. Products imported from equivalent third countries must comply with those additional requirements to be able to bear the organic production logo of the European Union when imported. The proposed measure also specifies conditions for the use of the organic production logo of the European Union on processed products produced in the Union with ingredients imported from equivalent third countries. Finally, the proposed measure amends Article 32 of Regulation (EU) 2018/848 to exclude from the obligation of using the organic production logo of the European Union that prepacked food produced within the Union with ingredients imported from third countries whose organic production and control systems have been recognised as equivalent to those of the Union and where those ingredients account for more than 5% of the agricultural ingredients of the product by weight and do not comply with certain additional production and control requirements.

### ***3.3. Conditions for exempting smaller operators from the organic operator certificate***

Article 35(8) of Regulation (EU) 2018/848 lays down the conditions under which Member States can exempt smaller operators that sell unpacked organic products other than feed directly to the final consumer from the obligation to hold a certificate pursuant to Article 35(1) of that Regulation. Those conditions are the following: '*[...] (a) such sales do not exceed 5 000 kg per year'; or (b) such sales do not represent an annual turnover in relation to unpacked organic products exceeding EUR 20 000'; or (c) the potential certification cost of the operator exceeds 2% of the total turnover of unpacked organic products sold by that operator*'.

The increasing costs faced by smaller operators since the entry into application of Regulation (EU) 2018/848 have caused their turnover from unpacked organic products other than feed to increase, sometimes to values considerably higher than EUR 20 000. This has created a barrier

preventing the operators concerned from meeting the conditions relating to turnover and has affected their eligibility. In addition, variations in costs each year mean that meeting the conditions is affected on an annual basis. Smaller operators no longer fulfil such conditions due to the above-mentioned increased costs. Consequently, they may have to undertake procedures such as inspections, checks and certification, in order to obtain a certificate pursuant to Article 35(1) of Regulation (EU) 2018/848. This incurs administrative costs.

To address this, the proposed measure abolishes points (b) and (c) of Article 35(8) of Regulation (EU) 2018/848. These points contain the conditions for total turnover from unpacked organic products, which exempt smaller operators selling unpacked organic products other than feed from the obligation to hold a certificate pursuant to Article 35(1) of Regulation (EU) 2018/848.

This will avoid any disproportionate burden on smaller sellers and make the marketing of organic products easier. In the Member States where this exemption is already applied, smaller operators that sell unpacked organic products to final consumers save on costs related to controls and certification.

Certain smaller operators in specific areas and sectors, also sell more than 5 000 kg of goods per year and therefore benefit from the conditions related to the organic turnover for their eligibility. The proposed measure abolishing points (b) and (c) of Article 35(8) of Regulation (EU) 2018/848, will result in them not being able to fulfil the remaining condition related to the maximum amount of sales. To avoid this, the proposed measure doubles the condition set out in point (a) of Article 35(8) of that Regulation, and fixes it at a maximum of 10 000 kg of sales per year.

The proposed measure will benefit **smaller operators that sell unpacked organic products** other than feed to the final consumer. It will help them obtain an exemption from holding a certificate.

It is estimated that around 19 500 operators will benefit from the proposed changes of the eligibility conditions<sup>15</sup>. Around three quarters of them operate in Member States where the costs of inspections, controls and certification are borne by public authorities. The average costs for that type of operators, if they are not exempted from holding a certificate are estimated at EUR 400 per year<sup>16</sup>. The proposed measure could therefore bring administrative cost savings of EUR 7.8 million annually (costs normally borne in relation to non-exempted operators), of which EUR 5.9 million for administrations and EUR 1.9 for the operators themselves.

The notification obligation referred to in Article 34(1) of Regulation (EU) 2018/848 will continue to guarantee supervision by the competent authorities of the Member States and ensure adequate transparency of the certification system in relation to the exempted operators and the integrity of the organic products they sell. The measure will continue to remain, in any case, a decision by Member States.

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<sup>15</sup> European Commission, 2025, [National lists of organic operators exempted from certification](#) and further elaborations based on Commission expert judgement.

<sup>16</sup> Eurostat [Structure of earnings survey, Labour Force Survey data for Non-Wage Labour Costs](#) and further elaborations based on Commission expert judgement.

### 3.4. Requirements for groups of operators and their members

Article 36(1) of Regulation (EU) 2018/848 lays down provisions on groups of operators and their members in the EU and third countries. Members of groups of operators are farmers or producers of algae or aquaculture animals. They may additionally be engaged in processing, preparation or placing on the market of food or feed.

As for the requirements for members of groups of operators, Article 36(1) states that “*Each group of operators shall [...] only be composed of members: (i) of which the individual certification cost represents more than 2 % of each member’s turnover or standard output of organic production and whose annual turnover of organic production is not more than EUR 25 000 or whose standard output of organic production is not more than EUR 15 000 per year; or (ii) who have each holdings of maximum: — five hectares, — 0,5 hectares, in the case of greenhouses, or — 15 hectares, exclusively in the case of permanent grassland; and [...] (d) have legal personality*”.

Evidence in relation to the implementing<sup>17</sup> these provisions has shown significant difficulties in setting up groups of operators that fulfil the requirements related to the group’s legal personality and the annual turnover of members. The requirements related to the group’s legal personality result in increased administrative and certification costs. They reduce the incentive for operators to join and create a need to reorganise economic activities and create new, separate, legal personalities of groups of producers, which are currently grouped in cooperative associations, cooperatives, associations, federations or organisations. The requirements related to the annual turnover of members results in increased administrative costs due to a reduced number of potential members, which are affected by increased costs and inflation.

Such difficulties therefore prevent smaller operators from joining groups of operators, since the rules in place do not appropriately reflect the needs and resource capacity of smaller farmers and operators, and reduce the profitability of the businesses. In third countries, reorganising the producers’ activities can also cause difficulties in supplying the EU with products originating from those countries, such as spices, tropical fruits, cocoa, coffee or tea. There is therefore a risk of trade disruptions, as operators are obliged to redirect their goods to other overseas markets.

The proposed measure therefore abolishes point (b)(i) of Article 36(1) of Regulation (EU) 2018/848, i.e. the requirement on annual turnover for members of groups of operators.

Certain smaller operators are based in specific areas and sectors characterised by lower annual turnover due to less profitable activities. However, they run holdings with larger surfaces than

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<sup>17</sup> Meinshausen et al., 2024: Impact of the New EU Organic Regulation on Smallholder Value Chains and the European Organic Sector, Research Institute of Organic Agriculture FiBL; Meinshausen & Blanco, 2024: Case study on the implications for low- and middle-income countries of Organic Regulation (EU) 2018/848 in the Dominican Republic, COLEAD and FiBL; Solfanelli et al., 2021: Potential outcomes and impacts of organic group certification in Italy: An evaluative case study, <https://doi.org/10.1016/j.ecolecon.2021.107107>; Petrelli & Ghedira, 2020: Group certification in organic farming: a comparison of the new European rules Technical report 2, <https://hdl.handle.net/11581/459970>.

the current maximum surfaces laid down in point (b)(ii) of Article 36(1). They therefore benefit from the conditions related to organic turnover for their eligibility. The proposed measure abolishing points (b)(i) of Article 36(1) of Regulation (EU) 2018/848, will mean they cannot meet the remaining condition related to maximum surfaces. To avoid this, the proposed measure revises the condition related to the maximum surface in point (b)(ii) of that Article, increasing it to: - ten hectares, - one hectare in the case of greenhouses, and - thirty hectares exclusively in the case of permanent grassland. This will help **smaller operators (farmers)** such as arable crop producers in the EU<sup>18</sup> and coconut producers in certain third countries participate in the system of groups of operators<sup>19</sup>.

The requirements for groups of operators in the proposed measure also include the possibility for the group to be part of a farmer cooperative association, operator cooperative, association, federation or organisation that has a legal personality. This requirement will prevent groups of operators from being forced to set up a new, separate legal personality when they are part of an entity with a legal personality. It will therefore mean administrative cost savings for those smaller operators that are part of a group or a cooperative, as they will not have to undergo individual inspections, controls and certification.

Estimations of cost savings are performed in relation to third country operators only. In the EU, the system of groups of operators for the purpose of the organic certification has had limited application. Even if the proposed measure will, in principle, also encourage the uptake of that system in the EU, setting a benchmark for the costs currently incurred and calculating costs savings might not produce representative and reliable data.

Geographical areas where producers are organised in cooperatives or similar entities for the purpose of exporting organic products to the EU are Latin America, the Caribbean, Asia, Africa and the non-EU Mediterranean area. There are around 1 400 groups and 1.1 million farmers in those areas<sup>20</sup>. Around 70% of those cooperatives or similar entities and their members would benefit from the proposed measure<sup>21</sup>.

Cost savings represent around EUR 70 per member<sup>22</sup>. This is based on the average administrative costs for certification to fulfil the current requirements of points (b)(i) and (ii) of Article 36(1) of Regulation (EU) 2018/848. They consist of savings due to fewer changes to the governance of the control system of groups of operators and reduced recourse to the external certification system (i.e. operators inspected individually), in favour of more recourse to a system of internal controls as referred to in Article 36(1), point (g), of Regulation (EU)

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<sup>18</sup> Solfanelli et al., 2021. DOI: <https://doi.org/10.1016/j.ecolecon.2021.107107>.

<sup>19</sup> Meinshausen et al., 2024: Impact of the New EU Organic Regulation on Smallholder Value Chains and the European Organic Sector. Research Institute of Organic Agriculture FiBL.

<sup>20</sup> Meinshausen et al., 2024: Impact of the New EU Organic Regulation on Smallholder Value Chains and the European Organic Sector, Research Institute of Organic Agriculture FiBL; Meinshausen & Blanco, 2024: Case study on the implications for low- and middle-income countries of Organic Regulation (EU) 2018/848 in the Dominican Republic, COLEAD and FiBL.

<sup>21</sup> *Ibid.*

<sup>22</sup> *Ibid.*

2018/848. Instances of multiple certificates of inspection being issued ahead of exports will also be reduced.

Such cost savings can be repeated over time (e.g. the legal and accountancy costs related to maintaining the legal personality or to adopting the control system of the group of operators instead of operators being inspected individually). Therefore, they represent administrative cost savings of EUR 77 million annually. Since they occur outside of the EU, they are not being considered in the table in Annex I of this document.

### ***3.5. Postponing the expiry of equivalences with third countries***

The Commission recognised 11 third countries pursuant to Article 33(2) of Regulation (EC) No 834/2007<sup>23</sup> for the purpose of equivalence. Article 48(1) of Regulation (EU) 2018/848 sets an expiry date of 31 December 2026 for the recognition of those 11 third countries. After that date, the existing equivalence arrangements will come to an end and will have to be replaced by international agreements on trade in organic products, in accordance with Article 47 of Regulation (EU) 2018/848.

The recognition of third countries whose organic production and control systems have been recognised as equivalent to those of the EU will expire on 31 December 2026. On 28 June 2021<sup>24</sup>, the Council authorised the Commission to open negotiations with the third countries recognised for the purpose of equivalence under Regulation (EC) No 834/2007 with a view to concluding agreements on trade in organic products. On that basis, the Commission is conducting technical exchanges with those third countries. Those exchanges show different levels of progress due to the diversity of legal and regulatory frameworks and complexities linked to varying consumer perceptions of organic production from one organic production system to the other. It is therefore necessary and urgent for those third countries to continue to be recognised until 31 December 2036 to avoid disruptions in the trade of organic products.

The proposed measure postpones the date of expiry of the recognition of the 11 third countries laid down in Article 48(1) of Regulation (EU) 2018/848 to 31 December 2036, with view to allow for a sufficiently long period of time to complete these exchanges and the subsequent negotiations and ensure a smooth transition to the scheme of recognition of third countries through international agreements.

If the equivalence arrangements were to expire on 31 December 2026, it would be more difficult to continue current trade with the equivalent third countries concerned. This would be

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<sup>23</sup> Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products and repealing Regulation (EEC) No 2092/91 (OJ L 189, 20.7.2007, pp. 1–23 ELI: <http://data.europa.eu/eli/reg/2007/834/oi>).

<sup>24</sup> Council Decision (EU) 2021/1345 of 28 June 2021 authorising the opening of negotiations with Argentina, Australia, Canada, Costa Rica, India, Israel, Japan, New Zealand, South Korea, Tunisia and the United States with a view to concluding agreements on trade in organic products (OJ L 306, 31.8.2021, pp. 2–3 (ELI: <http://data.europa.eu/eli/dec/2021/1345/oi>).

particularly detrimental to EU operators, as the EU enjoys a positive trade balance with those third countries.

In such a scenario, in fact, **EU operators** would need to be certified as complying with third countries' national schemes (e.g. USDA organic, COR organic, JAS organic etc.) in order to export their goods to third countries. This would increase administrative costs for EU operators, e.g. for inspections, controls, audits and certification by the accredited control bodies and competent authorities of third countries. The increase in such costs would either reduce benefits or increase selling prices. In both cases, this would make EU organic operators less competitive on third country markets and make it more difficult for them to access those markets.

There are estimated to be 5 000 EU operators exporting goods from the EU to the main third countries with equivalence arrangements<sup>25</sup>. The four main third countries with equivalence arrangements are the United States, Canada, Japan and the Republic of Korea. If equivalences were to expire at the end of 2026, EU operators would have to be certified against the national standards of third countries in order to continue accessing their markets. In addition, other EU organic operators in the supply chain (e.g. producers, processors) may also have to be certified against those national standards<sup>26</sup>. A single third country certification is estimated to cost on average EUR 750 per operator annually<sup>27</sup>. Total administrative cost savings for them are therefore estimated at EUR 15 million annually.

It would also harm EU imports if the equivalences expired at the end of 2026. It would force **third country operators** to be certified against EU standards in accordance with point (b)(i) of Article 45(1) of Regulation (EU) 2018/848 (compliance import scheme). This would increase administrative costs for them, which would likely be reflected in increased costs of organic goods imported from those third countries and higher prices for consumers.

There are estimated to be 2 000 equivalent third country operators involved in activities for the purpose of exporting goods to the EU<sup>28</sup>. If they were subject to certification under the EU compliance import scheme, they would incur administrative costs estimated at an average of EUR 750 per operator annually<sup>29</sup>. Administrative cost savings for them are therefore estimated at EUR 1.5 million annually. Since they occur outside of the EU, they are not being considered in the table in Annex I of this document.

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<sup>25</sup> FiBL-AMI survey 2025 based on national data sources and Eurostat and Willer, Helga Jan Trávníček and Bernhard Schlatter (Eds.) (2025): The World of Organic Agriculture. Statistics and Emerging Trends 2025. Research Institute of Organic Agriculture FiBL, Frick, and IFOAM – Organics International, Bonn.

<sup>26</sup> Estimations of costs savings in this regard are hard to perform, in particular in relation to the number of those EU operators, their size and therefore the potential certification costs they would incur.

<sup>27</sup> [Eurostat Structure of earnings survey, Labour Force Survey data for Non-Wage Labour Costs](#) and further elaborations based on Commission expert judgement.

<sup>28</sup> TRACES (Trade Control and Expert System), European Commission, 2025 and FiBL-AMI survey 2025 based on national data sources and Eurostat and Willer, Helga Jan Trávníček and Bernhard Schlatter (Eds.) (2025): The World of Organic Agriculture. Statistics and Emerging Trends 2025. Research Institute of Organic Agriculture FiBL, Frick, and IFOAM – Organics International, Bonn and further elaboration based on Commission expert judgement.

<sup>29</sup> [Eurostat Structure of earnings survey, Labour Force Survey data for Non-Wage Labour Costs](#) and further elaborations based on Commission expert judgement.

The total administrative costs savings of the proposed measure therefore amount to EUR 16.5 million annually.

### ***3.6. Conversion period and minimum age at slaughter for quails for meat production***

Point 1.2.2 of Part II of Annex II to Regulation (EU) 2018/848 lays down a conversion period of 10 weeks for poultry for meat production. Point 1.9.4.1 of Part II of Annex II to that Regulation lays down minimum ages at slaughter, where slow-growing poultry strains are not used. Those provisions do not lay down any specific conversion period or a minimum age at slaughter for quails. In Member States where organic quails are raised for meat production, their production cycle is shorter than the cycle of other species of poultry for meat production, since they are slaughtered from 42 days of age. Furthermore, their conversion period is five weeks, i.e. one week less than the minimum age at slaughter for these species.

The proposed measure sets a conversion period of five weeks for quails for meat production, adapted to the length of their production cycle, and a minimum age of 42 days at slaughter where slow-growing poultry strains are not used. The proposed measure will mean that organic **operators (farmers)** benefit from an appropriate conversion period when introducing non-organic quails for meat production into their holdings, and an appropriate minimum age at slaughter for quails. The measure will therefore promote the expansion of organic quails for meat production. This is currently hindered by the rules, which are not appropriate for quails as a poultry species.

### ***3.7. Withdrawal period for treatments with veterinary medicinal products***

Point 1.5.2.5 of Part II of Annex II to Regulation (EU) 2018/848 lays down rules on veterinary treatments for terrestrial animals. Those rules provide that the withdrawal period after the use of chemically synthesised allopathic medicinal products as defined in Regulation (EU) 2019/6 of the European Parliament and of the Council<sup>30</sup> is twice the normal withdrawal period and with a minimum duration of 48 hours. This means that, even if the applicable normal withdrawal period of the veterinary medicinal product is zero days, the withdrawal period must be a minimum of 48 hours.

For aquaculture, point 3.1.4.2(f) of Part III of Annex II to Regulation (EU) 2018/848 provides that the withdrawal period after the use of allopathic veterinary medicinal products must be twice that of an authorised veterinary medicinal product, or a minimum of 48 hours if no period is specified.

The rules on the withdrawal period create a burden for the production of terrestrial animals, particularly in cases where the withdrawal period specified in the veterinary medicinal product is zero days. The proposed measure aligns the rules on the withdrawal period for terrestrial

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<sup>30</sup> Regulation (EU) 2019/6 of the European Parliament and of the Council of 11 December 2018 on veterinary medicinal products and repealing Directive 2001/82/EC (OJ L 4, 7.1.2019, p. 43, ELI: <http://data.europa.eu/eli/reg/2019/6/oj>).

animals with those for aquaculture. It thereby removes the burden organic **operators (farmers)**, notably in the poultry and dairy sectors, where certain veterinary medicinal products that are commonly used specify withdrawal periods of zero days.

The proposed measure will also allow products originating from animals in those sectors, such as eggs or dairy products, to be placed on the market as organic immediately at the end of any veterinary treatment resulting in zero days of withdrawal period, instead of only after an additional 48 hours. This will increase the earnings of the organic operators concerned and will allow organic products to be marketed that, otherwise, would be either redirected to other supply chains, with consequent practical complications for operators, or might be destroyed.

The proposed measure will further guarantee the integrity of organic production for **consumers** and, at the same time, simplify matters for operators in cases where the veterinary medicinal products used do not cause a risk to public health, their withdrawal period being set at zero days.

As regards the egg sector, there are 26.4 million of organic laying hens in the EU and their average productivity is 90%<sup>31</sup>. They are treated an average of four times a year<sup>32</sup> with veterinary medicinal products having a withdrawal period of zero days. It is therefore likely that 190 million eggs cannot be sold as organic during the 48 hours following the end of those treatments. They are either redirected to other supply chains under other labels, sold as conventional eggs, or, possibly, destroyed. Considering the difference between the average price paid to farmers for organic and conventional eggs<sup>33</sup>, the proposed measure may bring adjustment cost savings of EUR 9.5 million annually for organic **operators (farmers)**.

### ***3.8. Conditions for access to open air areas for poultry***

Point 1.9.4.4(e) of Part II of Annex II to Regulation (EU) 2018/848 lays down rules on housing and husbandry practices for poultry. Those rules provide, among other things, that poultry must be provided with continuous daytime open air access from as early an age as practically possible.

In the case of split-rearing systems, poultry may be reared for the first few days of life in a poultry house of a production unit on a holding that structurally lacks open air access. Subsequently, poultry may be transferred to another poultry house, including in a production unit of another holding, with open air access for the following phases of the life cycles. Mandatory open air access for young, unfeathered birds can put at risk their safety and, possibly, their survival. This is because, in this period of their life-cycle, they need, among other things, stable temperatures to develop their feeding and drinking behaviours, immunisation against infections, and shelter from any predators. In the early phases of their

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<sup>31</sup> [https://agridata.ec.europa.eu/extensions/DataPortal/agricultural\\_markets.html](https://agridata.ec.europa.eu/extensions/DataPortal/agricultural_markets.html).

<sup>32</sup> Based on organic stakeholders' expert judgement.

<sup>33</sup> <https://agridata.ec.europa.eu/extensions/DashboardPrice/OrganicPricesTrends.html#>.

production cycle, in fact, their lack of feathers prevents them from regulating their body temperature in outdoor conditions.

The proposed measure makes continuous daytime open air access subject to the condition that birds must be sufficiently feathered to regulate their body temperature when exposed to outdoor conditions. This will allow organic certification to be granted to organic farming sector **operators (farmers) that run split-rearing systems**, where the poultry houses structurally lack access to the open air since they are only used in the first weeks of life of the birds. In this sense, the proposed measure also reduces the risks for those animals, benefitting their health and welfare.

The requirement in point 1.9.4.4(d) of Part II of Annex II to Regulation (EU) 2018/848 will continue to guarantee that poultry animals are given access to open-air areas for at least one third of their life, regardless of where they are reared during their production cycle. This will continue to uphold the animal welfare requirements of the Regulation.

There are 14.3 million young poultry animals in the EU, of which 7 million are potentially covered by the current requirements on access to open air areas<sup>34</sup>. One-off adjustment costs to comply with those requirements, e.g. adapting existing poultry houses or building new outdoor areas, are estimated at EUR 15.6 per young poultry head<sup>35</sup>. The proposed measure may therefore bring one-off adjustment cost savings of EUR 109.2 million for **operators (farmers)**.

Amending the requirements on access to open air areas will ensure that birds are sufficiently feathered to regulate their body temperature when exposed to outdoor conditions before having access to open air areas. This will avoid the costs linked to losing young poultry animals, estimated at EUR 1.7 per young poultry head<sup>36</sup> by reducing their mortality in their first weeks of age. The proposed measure may therefore bring adjustment costs savings of EUR 11.9 million annually for **operators (farmers)**.

More generally, the measure will contribute to further developing the organic poultry sector, boosting the productivity of operators and avoiding losses in the early rearing phase.

### **3.9. Poultry houses per production unit for fattening poultry**

Point 1.9.4.4(m) of Part II of Annex II to Regulation (EU) 2018/848 lays down that the total usable surface area for fattening poultry in poultry houses of any production unit must not exceed 1 600 m<sup>2</sup>. This limits the further development of organic fattening poultry production by limiting the size of any fattening poultry houses in an organic production unit and does not bring any additional benefits in terms of animal welfare or the environment.

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<sup>34</sup>[https://agridata.ec.europa.eu/extensions/DataPortal/agricultural\\_markets.html](https://agridata.ec.europa.eu/extensions/DataPortal/agricultural_markets.html),  
[https://ec.europa.eu/eurostat/databrowser/view/org\\_lsts/spec/default/table?lang=en&category=agr.org](https://ec.europa.eu/eurostat/databrowser/view/org_lsts/spec/default/table?lang=en&category=agr.org) and further elaborations based on Commission expert judgement.

<sup>35</sup> Based on organic stakeholders' expert judgement provided in the Call for Evidence.

<sup>36</sup> Based on organic stakeholders' expert judgement.

The proposed measure lays down the maximum usable surface area for fattening poultry at the level of the poultry houses instead of at production unit level. This will allow operators to have several poultry houses, each of a maximum 1 600 m<sup>2</sup>, in the production units of their holding. This increase in the total maximum usable surface area for fattening poultry will allow operators to benefit from economies of scale, thus optimising production costs and the overall management of their farms. In particular, it will avoid holdings being split up for the sole purpose of operating multiple organic production units and poultry houses. This will allow operators to avoid the costs linked to creating multiple holdings and paying for multiple organic inspections and certifications.

There are approximately 32 million fattening poultry in the EU, of which 16 million are in holdings potentially affected by the current requirements on poultry houses per production unit<sup>37</sup>. The administrative costs of complying with those requirements, such as creating a new organic certified holding for the purpose of operating an extra organic production unit and therefore poultry house, are estimated at EUR 1.56 per head of poultry<sup>38</sup>. They are also recurrent since the costs related to keeping a holding and undergoing organic inspection and certification are payable each year.

The proposed measure may therefore give rise to administrative cost savings for **operators (farmers)** of EUR 25 million annually. More generally, it will remove market barriers and boost the growth and competitiveness of the organic fattening poultry sector.

The presence of several poultry houses in a production unit could result in a higher number of fattening poultry reared on the same holding. Any such increase in the number of poultry houses in production units will be subject to the requirements of Regulation (EU) 2018/848 and Commission Implementing Regulation (EU) 2020/464<sup>39</sup>. Those requirements govern aspects such as animal welfare, housing conditions, stocking densities and minimum surface for indoor and outdoor areas.

#### 4. ENVIRONMENTAL AND SOCIAL IMPACTS

Beyond the reduction in costs, removing barriers for operators in the EU and in third countries is expected to help preserve organic farming and stimulate its uptake. The proposed amendments are specifically designed to uphold the principles and high standards of organic production in the EU, ensuring that the environmental and social benefits of organic production are sustained.

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<sup>37</sup>[https://agridata.ec.europa.eu/extensions/DataPortal/agricultural\\_markets.html](https://agridata.ec.europa.eu/extensions/DataPortal/agricultural_markets.html),  
[https://ec.europa.eu/eurostat/databrowser/view/org\\_lstdspec/default/table?lang=en&category=agr.org](https://ec.europa.eu/eurostat/databrowser/view/org_lstdspec/default/table?lang=en&category=agr.org) and further elaborations based on Commission expert judgement.

<sup>38</sup> Based on organic stakeholders' expert judgement provided in the Call for Evidence.

<sup>39</sup> Commission Implementing Regulation (EU) 2020/464 of 26 March 2020 laying down certain rules for the application of Regulation (EU) 2018/848 of the European Parliament and of the Council as regards the documents needed for the retroactive recognition of periods for the purpose of conversion, the production of organic products and information to be provided by Member States (OJ L 98, 31.3.2020, pp. 2–25, ELI: [http://data.europa.eu/eli/reg\\_impl/2020/464/oi](http://data.europa.eu/eli/reg_impl/2020/464/oi)).

The environmental benefits of organic farming have been widely documented, and the measures included in this proposal – aimed at facilitating the uptake of organic farming and promoting the sector’s growth – will therefore be beneficial in this regard. For instance, this is particularly the case for water protection, soil conservation and biodiversity enhancement<sup>40</sup>. Overall, organic farming uses a number of management practices that contribute to climate change mitigation and hence, the prime objective of climate-neutrality. When assessed per unit of land, organic farming contributes to climate change mitigation through lower energy use and fewer greenhouse gas emissions owing to the limited use of fertilisers<sup>41</sup>. Moreover, organic farming has the potential for higher soil carbon sequestration compared to conventional agriculture<sup>42</sup>. These benefits derive both from the system-based approach of organic farming, as well as from the practices adopted by organic operators, such as avoiding the use of synthetic fertilisers, the mandatory application of crop rotation, and higher standards in terms of animal welfare and husbandry<sup>43</sup>.

As the targeted adjustments and the amendments regarding trade of organic products are designed to promote the organic sector’s growth, and due to the abovementioned overall contribution of organic agriculture to climate change mitigation, the proposed measures are expected to result in no increase in greenhouse gas emissions. Therefore, the proposed measures are consistent with the climate-neutrality objective set out in Article 2(1) of Regulation (EU) 2021/1119<sup>44</sup> (European Climate Law), as well as the EU 2030<sup>45</sup> and 2040<sup>46</sup> climate targets. Moreover, thanks to its higher species diversity and the better capacity of organic fields to hold water, organic farming practices can strengthen resilience to weather extremes<sup>47</sup>, thereby contributing to the EU’s efforts in climate change adaptation, provided for in Article 5 of Regulation (EU) 2021/1119.

As regards the social benefits, the proposal aims to increase the profitability of organic operators. Research suggests that increased income predictability can lower farmer stress levels and lead to improved mental health outcomes and overall well-being for farmers and farm

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<sup>40</sup> Sanders, J. et al., Benefits of organic agriculture for environment and animal welfare in temperate climates. *Org. Agr.* (2025) 15:213–23. <https://doi.org/10.1007/s13165-025-00493-w>.

<sup>41</sup> Seufert, V. and Ramankutty, N., Many shades of gray—The context-dependent performance of organic agriculture. (2017) *Sci. Adv.* 2017;3: e1602638. <https://doi.org/10.1126/sciadv.1602638>.

<sup>42</sup> A. Gattinger, A. Müller, M. Haeni, C. Skinner, A. Fliessbach, N. Buchmann, P. Mäder, M. Stolze, P. Smith, N.E. Scialabba, & U. Niggli, Enhanced top soil carbon stocks under organic farming, *Proc. Natl. Acad. Sci. U.S.A.* 109 (44) 18226–18231, <https://doi.org/10.1073/pnas.1209429109> (2012).

<sup>43</sup> Sanders, J. et al., Benefits of organic agriculture for environment and animal welfare in temperate climates. *Org. Agr.* (2025) 15:213–23. <https://doi.org/10.1007/s13165-025-00493-w>.

<sup>44</sup> Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') (OJ L 243, 9.7.2021, pp. 1–17, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021R1119>).

<sup>45</sup> [https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2030-climate-targets\\_en](https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2030-climate-targets_en).

<sup>46</sup> Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) 2021/1119 establishing the framework for achieving climate neutrality [https://climate.ec.europa.eu/document/download/e1b5a957-c6b9-4cb2-a247-bd28bf675db6\\_en](https://climate.ec.europa.eu/document/download/e1b5a957-c6b9-4cb2-a247-bd28bf675db6_en).

<sup>47</sup> N. Scialabba, M. Müller-Lindenlauf, Organic agriculture and climate change, *Renewable Agriculture and Food Systems*, 25 (2), pp. 158 – 169 (2010) 10.1017/S1742170510000116.

workers<sup>48</sup>. This can foster better working conditions and social cohesion. It can also help to mitigate rural depopulation and preserve rural employment, as well as supporting the long-term viability of organic farming. The simplification of rules facilitates their application and implementation. Among other benefits, this simplification will help to avoid situations where farmers are forced to cut corners, including environmental or social safeguards, to remain competitive<sup>49</sup>.

With clearer and simpler EU legislation, organic operators will be encouraged to increase and expand their investments in the organic farming sectors covered by this proposal. This is expected to boost innovation in socially responsible business practices. The promotion of short supply chains, which emphasise direct and close relationships between farmers and consumers, is one of the objectives of Regulation (EU) 2018/848 and further growth in the organic farming sector will also serve that objective, thereby strengthening cohesion between rural and urban areas<sup>50</sup>.

Moreover, environmental and social aspects are closely intertwined: evidence shows that, particularly in third countries, smaller organic operators are also involved in socially fairer schemes (e.g. Fairtrade)<sup>51</sup>. In addition, the proportion of young farmers (those below the age of 40) is higher for organic farming (20.7%) than for all farms (11.9%), hinting at the important role of organic farming in generational renewal.<sup>52</sup>

## 5. CONTRIBUTION TO SIMPLIFICATION AND BURDEN REDUCTION, AND THE DIGITAL ASSESSMENT

Several elements in the proposal contribute to simplification, reducing bureaucracy and administrative burden for organic operators and Member States' administrations. In particular, they benefit operators in this regard in relation to: (i) allowing the use of the products and substances available on the market for cleaning and disinfection for use in processing and storage; (ii) adapting the conditions for the exemption of smaller operators selling unpacked organic products other than feed from the obligation of being in possession of a certificate pursuant to Article 35(1) of Regulation (EU) 2018/848; (iii) adapting the requirements for the composition of groups of operators; and (iv) adapting livestock production rules. Moreover, they benefit Member States' administration in relation to the adaptation of the conditions for the exemption of smaller operators selling unpacked organic products other than feed from the obligation of being in possession of a certificate pursuant to Article 35(1) of Regulation (EU)

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<sup>48</sup> Eurofound, 2020, p. 10 , European Agency for Safety and Health at Work, Mental health in agriculture: preventing and managing psychosocial risks for farmers and farm workers, Report, 2024, Available at: [https://osha.europa.eu/sites/default/files/documents/Mental-health-agriculture\\_EN.pdf](https://osha.europa.eu/sites/default/files/documents/Mental-health-agriculture_EN.pdf); Farmwell, Improving farmers' wellbeing through social innovation – Mapping report on challenges, 2021, Available at: [https://farmwell-h2020.eu/wp-content/uploads/2021/12/D-2.3\\_SYNTHESIS1.pdf](https://farmwell-h2020.eu/wp-content/uploads/2021/12/D-2.3_SYNTHESIS1.pdf).

<sup>49</sup> OECD, 2015, p. 41.

<sup>50</sup> Stein, A.J., Santini, F. The sustainability of “local” food: a review for policy-makers. Rev Agric Food Environ Stud 103, 77–89 (2022). <https://doi.org/10.1007/s41130-021-00148-w>.

<sup>51</sup> In the example of Fairtrade, farmers typically have conditions/additional requirements to fulfil in terms of sustainability criteria (environmental, social).

<sup>52</sup>[https://ec.europa.eu/eurostat/statistics-explained/index.php?oldid=685812#Profiles\\_of\\_managers\\_of\\_fully\\_organic\\_farms](https://ec.europa.eu/eurostat/statistics-explained/index.php?oldid=685812#Profiles_of_managers_of_fully_organic_farms).

2018/848. The proposal adapts the provisions of Regulation (EU) 2018/848 to the practical needs of operators, preserving objectives and principles of that Regulation, maintaining its high standards and avoiding one-size-fits-all approaches that might prove to be burdensome to implement and less effective.

Following the digital assessment, the current proposal does not include any requirements of digital relevance. Digital means or data exchange are not under the scope of this proposal.

## ANNEX I - Summary of cost benefits and burden reduction

Overview of burden reduction (total for all provisions)							
	Citizens/Consumers		Businesses		Administrations		
	One-off	Recurrent (annual)	One-off	Recurrent (annual)	One-off	Recurrent (annual)	
Products and substances for cleaning and disinfection in processing and storage facilities	Direct administrative cost savings	x	x	x	x	x	x
	Direct adjustment cost savings	x	x	x	EUR 68.8 million	x	x
Conditions for exemption of the organic operator certificate for smaller sellers	Direct administrative cost savings	x	x	x	EUR 5.9 million	x	EUR 1.9 million
	Direct adjustment cost savings	x	x	x	x	x	x
Postponement of the expiry of the equivalences with third countries	Direct administrative cost savings	x	x	x	EUR 15 million	x	x
	Direct adjustment cost savings	x	x	x	x	x	x
Withdrawal period for treatments with veterinary medicinal products on livestock	Direct administrative cost savings	x	x	x	x	x	x
	Direct adjustment cost savings	x	x	x	EUR 9.5 million	x	x
Conditions for access to open air areas for poultry	Direct administrative cost savings	x	x	x	x	x	x
	Direct adjustment cost savings	x	x	EUR 109.2 million	EUR 11.9 million	x	x
Poultry houses per production unit for fattening poultry	Direct administrative cost savings	x	x	x	EUR 25 million	x	x
	Direct adjustment cost savings	x	x	x	x	x	x

TOTAL	Direct administrative cost savings	x	x	x	EUR 45.9 million	x	EUR 1.9 million
	Direct adjustment cost savings	x	x	EUR 109.2 million	EUR 90.2 million	x	x

## **ANNEX II - Summary of suggestions put forward during the consultations and not retained in the initiative**

### *5.1. Livestock conversion*

Certain Member States and stakeholders suggested amending the provisions on the period of conversion for bovine and equine animals for meat production laid down in point 1.2.2(a) of Part II of Annex II to Regulation (EU) 2018/848, by removing the provision '*and in any case no less than three quarters of their lifetime*'.

Certain other Member States voiced their opposition to the removal of this provision, since it would undermine the incentive to produce organic bovine equine animals for meat production by making it easier to introduce non-organic animals into an organic production unit.

The Commission considers that clarification could be provided through non-legislative actions, such as via the FAQs, where rules and calculations for the conversion period could be clarified in order to facilitate and harmonise the implementation of this provision across Member States. In addition, removing the abovementioned provision would be inconsistent with other production rules laid down in Regulation (EU) 2018/848, such as the rules on the simultaneous conversion of production units and animals, laid down in point 1.2.1 of Part II of Annex II to that Regulation.

### *5.2. Soil management and fertilisation in greenhouses*

Certain Member States and stakeholders suggested amending the requirements for soil management in greenhouses laid down in point 1.9.2 of Part I of Annex II to Regulation (EU) 2018/848 by removing '*by the use of short-term green manure crops and legumes as well as the use of plant diversity*'.

This suggestion is incompatible with the objective, laid down in Article 4 of Regulation (EU) 2018/848, of maintaining long-term fertility of soils, and with the principle, laid down in Article 5 of that Regulation, of practising soil-related crop cultivation. Furthermore, such a suggestion would be incompatible with the Commission proposal<sup>53</sup> for amendments to the CAP regulations (Regulation (EU) 2021/2115 and Regulation (EU) 2021/2116). Under that proposal, farmers certified under Regulation (EU) 2018/848 would be deemed compliant with certain Good Agricultural and Environmental Conditions (GAEC) standards.

### *5.3. Handling of residues in organic production*

Certain Member States and stakeholders suggested amending the rules on precautionary measures to avoid the presence of non-authorised products and substances and on the measures to be taken in the event of the presence of non-authorised products or substances. In particular,

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<sup>53</sup> COM/2025/236 final.

they proposed defining what constitutes a ‘*suspicion*’ of non-compliance and the ‘*presence*’ of non-authorised products and substances that trigger the launch of an official investigation.

In accordance with Article 29(4) of Regulation (EU) 2018/848, the Commission will present a report to the European Parliament and the Council on the implementation of Article 29, on the presence of non-authorised products and substances and on the assessment of the national rules referred to in paragraph 5 of that Article. That forthcoming Commission report may be accompanied, where appropriate, by a legislative proposal for further harmonisation. In the meantime, and without prejudice to that, clarification on the current applicable provisions could also be provided through non-legislative actions, such as via the FAQs, dedicated working groups or workshops.

#### *5.4. Milk replacers*

In relation to point 1.4.1(g) of Part II of Annex II to Regulation (EU) 2018/848, certain Member States and stakeholders suggested allowing the use, for suckling animals, of milk replacers containing components of plant origin where maternal milk cannot be used.

Nutrition requirements are an important feature of organic production. Point 1.4.1 of Part II of Annex II to Regulation (EU) 2018/848 requires that feed be obtained primarily from the agricultural holding where the animals are kept or from organic or in-conversion production units belonging to other holdings in the same region. If the maternal milk is not available for suckling animals during the minimum suckling period, milk from other lactating animals may be used. Hence, milk of animal origin exists as an alternative to milk replacers containing components of plant origin and should therefore be used during the minimum suckling period.

#### *5.5. Non-organic animals grazing on organic land*

Certain Member States and stakeholders suggested allowing non-organic animals to graze on organic land.

There are already exemptions, under point 1.4.2 of Part II of Annex II to Regulation (EU) 2018/848, allowing non-organic animals raised under specific land support schemes to graze for a limited period each year on organic land. As a general rule, organic production should be separated from non-organic production in order to avoid commingling and fraud. The current provisions allow for a balance between flexibility and integrity of organic production and aim to avoid, among other things, the potential contamination of organic land with residues of non-authorised products and substances from non-organic animals. Additional clarification on this issue could also be provided through non-legislative actions, such as via the FAQs.

### *5.6. Exemption of certification for web shops selling pre-packed organic products to the final consumer*

Certain Member States and stakeholders suggested that web shops selling pre-packed organic products to the final consumer could be exempted from the requirement to have the certificate referred to in Article 35(1) of Regulation (EU) 2018/848.

This suggestion would not be in line with the organic certification system. This has already been clarified in the FAQs<sup>54</sup> on organic rules.

### *5.7. Plant reproductive material*

Certain Member States and stakeholders suggested amending the provisions on plant reproductive material.

The provisions on plant reproductive material are highly technical and concerns different types of plant reproductive materials (e.g. seeds, seedlings, organic heterogeneous material, etc.). In addition, plant reproductive materials have a dual nature, covering both products put on the market by nurseries and products used by farmers as external inputs or self-produced. This suggestion therefore requires an in-depth analysis and a comprehensive discussion with national experts in the GREX.

### *5.8. Aquaculture*

Certain Member States and stakeholders suggested amending the aquaculture rules as regards derogations for non-organic juveniles, water quality criteria for bivalves, and the requirement for fish oil and meal to come from sustainable certified fishery.

This suggestion is incompatible with the objective, laid down in Article 4 of Regulation (EU) 2018/848, of encouraging the preservation of rare and native breeds in danger of extinction, and with the principle, laid down in Article 5(d) of that Regulation, that '*the production of a wide variety of high-quality food and other agricultural and aquaculture products that respond to consumers' demand for goods that are produced by the use of processes that do not harm the environment, human health, plant health or animal health and welfare*'.

The phasing out of derogations in aquaculture was finalised in 2016 under Regulation (EC) No 889/2008 (the previous EU regulation on organic production). Reintroducing those derogations would undermine the incentive to produce organic juveniles and therefore be economically prejudicial to those operators that have already invested in them. The requirement for fish meal and oil to be certified as sustainable has been in force since organic aquaculture rules were initially adopted, under the above-mentioned Regulation (EC) No 889/2008. Finally, the requirements on water quality for bivalves have been strengthened in Regulation (EU)

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<sup>54</sup> [Organic rules – frequently asked questions](#) (Chapter 3, p.36).

2018/848 as there was a willingness among the co-legislators to define a criterion to clearly differentiate conventional aquaculture production from organic aquaculture production.

#### *5.9. Non-organic protein feed*

One Member State and certain stakeholders suggested amending the provisions on the authorisation to use non-organic protein feed either by extending the expiry of such authorisation beyond 31 December 2026, or by making it permanent. That authorisation is set out in Part II of Annex II to Regulation (EU) 2018/848, under point 1.9.3.1(c) for porcine animals and under point 1.9.4.2(c) for poultry.

Before 31 December 2026, the Commission must present a report to the European Parliament and the Council on the availability on the EU market of organic protein feed for the nutrition of poultry and porcine animals and, if relevant, on the causes of limited access to such feed (Article 53(7) of Regulation (EU) 2018/848). On the basis of that report and in accordance with Article 53(4) of that Regulation, the Commission is empowered to adopt delegated acts as from 1 January 2026 and to extend those authorisations or end them.

Any potential extension of those authorisations should be based on information, that the Commission has been collecting from Member States since 2022, on the availability of organic protein feed for porcine animals and poultry. Such information will be presented in the above-mentioned report by 31 December 2026 and any potential measure will be based on the above-mentioned empowerment.

#### *5.10. Removal of sea salt and other salts for food and feed*

One Member State and certain stakeholders suggested removing sea salt and other salts for food and feed from Annex I to Regulation (EU) 2018/848. Another stakeholder proposed that it be maintained.

The Commission adopted a delegated regulation laying down detailed production rules for sea salt and other salts for food and feed<sup>55</sup>. It was rejected by the European Parliament<sup>56</sup> and did not enter into force. In the absence of detailed production rules, and pursuant to Article 21(2) of Regulation (EU) 2018/848, some Member States have developed and applied detailed national rules for the production of those salts, as a result of which operators have started to produce and place on the market salts as organic products. Removing sea salt and other salts for food and feed from Annex I to Regulation (EU) 2018/848 would cause economical harm to those operators.

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<sup>55</sup> C(2023) 2781 final.

<sup>56</sup> European Parliament: Motion for a resolution B9-0308/2023.

### *5.11. Access to pasture/grazing for bovines*

One Member State and certain stakeholders suggested flexibility on access to pasture and grazing for certain categories and groups of bovines and in relation to the structural features of the holdings. In particular, they suggested that the Member States should be able to grant derogations from the rule on access to pasture for certain groups of animals to which access cannot be granted for reasons connected to the structure of holdings of operators certified as organic before 2025. In addition, they suggested that any such derogations should terminate by the end of 2035. In contrast, another Member State suggested that the current rules provide enough flexibility and that no changes should therefore be proposed in this regard.

The suggested flexibility would be incompatible with the objective, laid down in Article 4 of Regulation (EU) 2018/848, of contributing to high animal welfare standards and, in particular, to meeting the species-specific behavioural needs of animals. It would also be incompatible with the principles related to animal welfare laid down in points (d), (f)(ii) and (j) of Article 5 of that Regulation. Furthermore, the current rules set out in Regulation (EU) 2018/848 already provide organic farmers with flexibility as regards the access to pasture related to temporary climatic or soil conditions or human or animal health situation.

### *5.12. Organic ingredients naturally rich in micronutrients*

One Member State and certain stakeholders suggested modifying the requirements on organic ingredients that are naturally rich in micronutrients. This suggestion is linked to the existing restrictions on enriching organic processed food with vitamins, minerals and micronutrients, as laid down in point 2.2.2(f) of Part II of Annex II to Regulation (EU) 2018/848.

A request for a preliminary ruling is currently pending before the Court of Justice of the European Union<sup>57</sup> on the possibility of using the powder obtained from certain algae, certified as organic, for the purpose of adding calcium to vegetable drinks.

The Commission will not undertake any action in this regard until the Court of Justice of the European Union has delivered its preliminary ruling. An appropriate empowerment for a delegated regulation is in any event already laid down in point (b) of Article 16(2) of Regulation (EU) 2018/848.

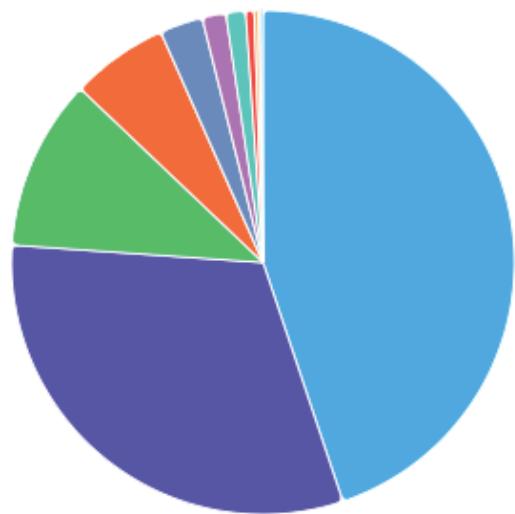
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<sup>57</sup> Case C-295/25, Lima: Request for a preliminary ruling from the Raad van State (Belgium) lodged on 23 April 2025 – Lima BV v Vlaams Gewest (OJ C, C/2025/4732, 8.9.2025, ELI: <http://data.europa.eu/eli/C/2025/4732/oj>).

### ANNEX III – Overview of Call for Evidence respondents' statistics

By category of respondent:

- EU citizen: 323 (44.86%)
- Company/business: 225 (31.25%)
- Business association: 79 (10.97%)
- Other: 45 (6.25%)
- Non-governmental organisation (NGO): 20 (2.78%)
- Public authority: 11 (1.53%)
- Trade union: 9 (1.25%)
- Non-EU citizen: 4 (0.56%)
- Consumer organisation: 2 (0.28%)
- Academic/research Institution: 1 (0.14%)
- Environmental organisation: 1 (0.14%)



## By country:

