

EUROPEAN COMMISSION
 DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate H - Sustainability and Quality of Agriculture and Rural Development
 H.3. Organic farming

Brussels, **13. 03. 2012**
 AGRI H.3/SC/sm agri.ddg3.h.3(2012)187625

Subject: Humic acids as feed material

Dear Mrs. Schlosserova,

Thank you for your letter dated 9 February 2012.

Let me recall that in our previous exchanges, we informed you that the proposal to the EGTOP would have been to assess Humic acids as feed material. After the assessment, the Group concluded that Humic acid substances are not currently authorised as a feed additive under EU legislation, so they cannot be considered for use as such in organic farming. Their classification as feed material was not considered to be appropriate by the Group, which also noted their current designation as pharmacologically active substances with possible implications for animal health (their use should be curative, not prophylactic, in accordance with organic principles. Curative use is also consistent with EMA scientific opinion (EMA, 1999)).

As regards the possible authorisation of Humic acids under Council Regulation (EC) No 1831/2003 and their inclusion in the corresponding EU Register of Feed Additives, I would like to draw your attention to the fact that DG Health and Consumers is in charge of EU feed legislation. I advise you to contact them directly and/or to send them the relevant dossier, in order to clarify this issue. The desk officers are Mr. Granero Rosell Miguel-Angel and Mr. Wolfgang Trunk Unit D2.

Yours sincerely,

Jean-François HULOT

Enclosure: Letter D85622 second reply to SK on humic acids

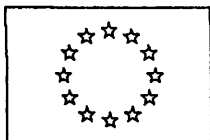
Copies: SCOF Delegates
 Mr. Granero Rosell Miguel-Angel, Mr. Wolfgang Trunk – Unit D2

Dr. Dipl. Ing. Juliana SCHLOSSEROVA

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- 2 FEB. 2011

Brussels,
AGRI H.3/SC/rmh D(2011) 85622

Subject: Proposal for inclusion of feed additive for organic farming

Dear Mrs. Schlosserova,

I am writing you in reference to your e-mails of 14 and 21 June 2010 on a proposal for inclusion of a feed additive in Annex VI to Commission Regulation (EC) No 889/2009.

As you know the expert group for technical advice on organic production has become operational. The Group will work on the basis of mandates written by the EC. Therefore, we are now in the process of writing the relevant mandates (feed and fertilizers) and examining the relevant dossiers concerning the proposals made by MS for authorisation of the use in organic production.

In the letter "Proposal for inclusion as feed additive for organic farming" attached to the above mentioned e-mails, you refer to Humic acid substances as feed additive for a possible use in the organic production.

From the information we got from DG Health and Consumers to which we sent your request, Humic acid substances are not feed additives according to Council Regulation (EC) No 18631/2003. Consequently they are not included in the corresponding EU Register of Feed Additives.

As you know according to Article 1.4 of Council Regulation (EC) No 834/2007, this Regulation shall apply without prejudice to other european provisions or national provisions, in conformity with european law concerning products specified in this Article, such as provisions governing the production, preparation, marketing, labelling and control, including legislation on foodstuffs and animal nutrition.

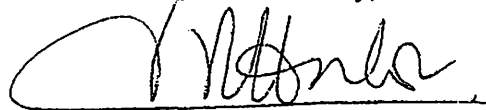
Therefore, the possible legal status of Humic acid substances according to the EU transversal legislation should be clarified before or in parallel of a possible evaluation under the organic legislation. They may nevertheless be regarded as a feed material. However, you must know that DG Health and Consumers is in charge with EU feed

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legislation. Therefore, we advise you to contact them directly and/or to send them the relevant dossier in order to clarify this issue. The desk officers are Mr. Granero Rosell Miguel-Angel and Mr. Wolfgang Trunk Unit D2.

The Group may examine among the others also the above mentioned substances as possible feed material purely from the organic legislation point of view and pending the evaluation from the DG Health and Consumers.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Hulot', written over a horizontal line.

Jean- François HULOT
Head of Unit

Enclosures;

-Letter "Proposal for inclusion of feed additive for organic farming"

Copies:

SCOF Delegates, Mr. Granero Rosell Miguel-Angel, Mr. Wolfgang Trunk – Unit D2