



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability
The Director (acting)

Brussels
PP/sml/agri.b.4(2023)2288126

Dear [REDACTED],

I would like to thank you for your email of 14 February 2023 ⁽¹⁾ asking for advice on a possible purchase of organic certified beeswax. Please do note that we cannot provide advice to individuals on their personal or business choices. Similarly, we cannot provide legal advice or interpret EU law for you. The services of the Commission can only provide with general information on Union policies. It is within these limits that we are answering your questions. In particular, you ask the following:

1. *Can I purchase certified organic beeswax/wax foundation from this company (<https://www.wachs-hoedl.com/>) in order to use it for my organic beekeeping activity?*
2. *Should I locate certified organic beeswax/wax foundation from a company and/or an EU-based certified organic beekeeper with the corresponding standards (zero residuality at LoQ = 0.500 mg/kg), can I acquire their product in order to use it for my organic beekeeping activity?*

As you know, since 1 January 2022, Regulation (EU) 2018/848 of the European Parliament and of the Council on organic production and labelling of organic products ⁽²⁾ applies. Beeswax is among the products listed in Annex I to that Regulation and hence is now covered by the scope of the organic legislation. This means that, since 1 January 2022, beeswax can be certified as organic provided it complies with the relevant provisions of Regulation (EU) 2018/848.

Beeswax can be used as an input in organic beekeeping. I refer in particular to the provisions of point 1.2.2 (f) of part II of Annex II to Regulation (EU) 2018/848 on conversion: “*Conversion periods specific to the type of animal production are set out as follows: (...) (f) 12 months for bees. During the conversion period, the wax shall be replaced with wax coming from organic beekeeping. However, non-organic beeswax may be used: (i) where beeswax from organic beekeeping is not available on the market; (ii)*

⁽¹⁾ Ares (2023)1140046

⁽²⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02018R0848-20220101&qid=1647509129216&from=EN>

where it is proven free of contamination with products or substances not authorised for use in organic production;

and (iii) provided that it comes from the cap; (...)”

Please also note the provisions of point 1.9.6.5 (e) of part II of Annex II to Regulation (EU) 2018/848 related to housing and husbandry practices for bees stating: “*With regard to housing and husbandry practices, the following rules shall apply: (...) (e) **the beeswax for new foundations shall come from organic production units;***”.

Therefore, to reply to your questions, I can confirm that organic operators must respect the abovementioned provisions. I would also like to call your attention to the fact that, in accordance with Article 34(6) of Regulation (EU) 2018/848, Member States must keep available the complete list of organic certified operators.

In order to verify that the producer of organic beeswax is duly certified, you can verify the data in the most updated national list of certified organic operators, which is made available by each Member State. I would recommend that you contact the competent authorities of the Member State in which the beeswax is certified and from the information you provided it should be Austria. You will find via the following link the relevant competent authorities’ contact details:

[European Commission - Agriculture - OFIS - OFIS Welcome Page \(europa.eu\)](https://ec.europa.eu/europeaid/what-we-do/sectors/agriculture-and-rural-development/eu-organic-agriculture-programme/organic-certification/organic-certification-offices/organic-certification-offices_en)

This opinion is provided on the basis of the facts set out in your letter of 14 February 2023 and expresses the opinion of the Commission services and does not commit the European Commission. In the event of a dispute involving Union law it is, under the Treaty on the Functioning of the European Union, ultimately for the Court of Justice of the European Union to provide a definitive interpretation of the applicable Union law.

Yours sincerely,

