



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability  
The Director

Brussels  
LB/agri.b.4(2022)5751935

Dear Ms Boonstra,

I would like to thank you for your email of 12 July<sup>1</sup>, in which you request clarifications regarding the rules on dehorning/disbudding under organic production.

I would like to start by highlighting that, even if the final objective is to have animals without horns, dehorning and disbudding are not equivalent in terms of the risks for animal welfare. Dehorning is usually considered riskier as it is performed when animals are older and the horns are already grown. I would then like to recall that, in order to take account of said difference, changes have been made to the wording of the provisions regarding the dehorning/disbudding of animals with the entry into force of Regulation (EU) 2018/848<sup>2</sup>.

Under Regulation (EC) No 889/2008<sup>3</sup>, Article 18(1) regarding the management of animals stated the following: “1. *Operations such as attaching elastic bands to the tails of sheep, tail-docking, cutting of teeth, trimming of beaks and dehorning shall not be carried out routinely in organic farming. However, some of these operations may be authorised by the competent authority for reasons of safety or if they are intended to improve the health, welfare or hygiene of the livestock on a case-by-case basis. Any suffering to the animals shall be reduced to a minimum by applying adequate anaesthesia and/or analgesia and by carrying out the operation only at the most appropriate age by qualified personnel.*” Hence, under the previous rules, the term “case-by-case” was interpreted strictly because the term dehorning was covering the operations of both dehorning and disbudding.

Now, under the new Regulation (EU) 2018/848, point 1.7.8 of Part II of Annex II regarding mutilations states the following: “*Without prejudice to developments in Union legislation on animal welfare, tail-docking of sheep, beak trimming undertaken in the first three days of life, and **dehorning may exceptionally be allowed, but only on a case-by-case basis and only when those practices improve the health, welfare or hygiene of the livestock or where workers’ safety would otherwise be compromised. Disbudding may be allowed only on a case-by-case basis when it improves the health, welfare or***”

---

<sup>1</sup> Ares(2022)5739799

<sup>2</sup> [EUR-Lex - 02018R0848-20220101 - EN - EUR-Lex \(europa.eu\)](#)

<sup>3</sup> [EUR-Lex - 02008R0889-20220101 - EN - EUR-Lex \(europa.eu\)](#)

Carla Boonstra  
Agricultural Counsellor  
Head of Unit Agriculture, Nature & Food Quality  
Permanent Representation of  
the Kingdom of the Netherlands to the European Union  
[carla.boonstra@minbuza.nl](mailto:carla.boonstra@minbuza.nl)

*hygiene of the livestock or where workers' safety would otherwise be compromised. The competent authority shall only authorise such operations where the operator has duly notified and justified the operations to that competent authority and where the operation is to be carried out by qualified personnel”.*

Hence, under the new rules, a clear distinction is made between dehorning and disbudding and, in the case of dehorning, the term “exceptionally” is used whereas it is not used for disbudding. Given that a ‘case by case’ examination for disbudding of an individual animal, as mentioned in Article 18(1) of Regulation (EC) No 889/2008 and in point 1.7.8. of Part II of Annex II of Regulation (EU) 2018/848, would in practice lead to excessive administrative burden and seems therefore not feasible in practice, the Commission services consider it as acceptable that a farm-specific authorisation for disbudding as a preventive measure is issued if these mutilations are justified by the situation in a given holding and they are not practiced routinely in this holding and that this complies with the requirement of a case by case authorisation. I hence confirm to you that the position of the Commission services regarding disbudding is as stated in the letter of clarification Ares(2021)5808953.

As concerns dehorning, this operation should remain exceptional and the term ‘case by case’ should be understood as referring to an individual animal-specific authorisation (animal by animal).

I hope this letter helps to clarify the matter.

The present opinion is provided on the basis of the facts as set out in your email of 12 July 2022 and expresses the view 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 European Court of Justice to provide a definitive interpretation of the applicable Union law.

Yours faithfully,



Michael PIELKE i.o.  
Pierre BASCOU

c.c.: Delegates of the Organic Production Committee