



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability

Brussels

Dear [REDACTED],

I would like to thank for your email of 11 July 2022¹, in which you request the Commission to review its decision on in-vitro cultivation in organic production on the basis of the special and extraordinary nature of the nursery technique used for sweet potatoes.

I would like to start by clarifying that there has been no decision from the Commission concerning the use of in-vitro cultivation in organic production.

Within this context, I would like to recall that point 1.8.4. of Part I of Annex II of Regulation (EU) 2018/848² lays down a specific provision concerning meristem culture as follows:

“1.8.4. For the production of organic varieties suitable for organic production, the organic breeding activities shall be conducted under organic conditions and shall focus on enhancement of genetic diversity, reliance on natural reproductive ability, as well as agronomic performance, disease resistance and adaptation to diverse local soil and climate conditions.

All multiplication practices except meristem culture shall be carried out under certified organic management.”

It is important to clarify that, in itself, this does not constitute a prohibition to use meristem culture. Indeed, considering the potentially long process of breeding for organic varieties, a meristem culture could be used, for example, to get initial material sanitised from viruses and, in such a case, it would constitute an exception that does not need to be carried out under certified organic management.

However, in the multiplication of plants, the practice itself cannot be certified organic, because organic plant reproductive material to be used for the production of organic products must be compliant with the provisions laid down under point 1.8.2 of Part I of Annex II of Regulation (EU) 2018/848.

¹ ARES(2022)5215726

² [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 \(OJ L 150, 14.6.2018 p.1 \)](#)

Point 1.8.2. reads as follows: “ 1.8.2. *To obtain organic plant reproductive material to be used **for the production of products other than plant reproductive material**, the mother plant and, where relevant, other plants intended for plant reproductive material production shall have been produced in accordance with this Regulation for at least one generation, or, in the case of perennial crops, for at least one generation during two growing seasons.*”

Sweet potato, *Ipomoea batatas L.*, being an annual plant, the mother plant or other plant intended for the production of the final plant reproductive material must be grown organically for one generation.

As you explain in your e-mail, in the case of sweet potato, the meristem culture is occurring at the initial phase of the process, when using the pre-basic material and, only after two years of growth under organic conditions, the final plant reproductive material is placed on the market as organic.

Therefore, on the basis of the description of the productive cycle of cuttings you provided in your e-mail, the final cuttings can be certified as organic.

The present opinion is provided on the basis of the facts as set out in your e-mail of 11 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,



c.c.:

