



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability

Brussels

Dear [REDACTED],

I would like to thank you for the question that you raised in the chat¹ during the meeting of the Organic Production Committee of 21 September 2022 regarding the labelling of compound feed containing non-organic protein feed and data on the trade/export of organic feed from Ukraine to the EU.

In the chat, you asked to clarify whether feed (containing a certain amount of non-organic component) produced in Member States according to exceptional rules can be placed on the market as organic within the entire EU. You also want to know the scale of the supply problems and ask for information on the amount of protein feed components imported from Ukraine into the EU in 2021 and 2022 according to TRACES.

I would like to inform you that the extract from TRACES regarding the data on exports of sources of organic protein feed from Ukraine to the EU in 2020, 2021 and 2022 (up to 30 June) has been made available on circa bc to all delegates to the Organic Production Committee. They will be updated with the latest data for the third quarter of 2022 (July, August and September) and put on circa bc for the next Organic Production Committee.

I would also like to recall that the derogation authorised under Article 1(1) of Commission Delegated Regulation (EU) 2022/1450² is limited to those operators of older poultry or older pigs identified as affected by a situation of catastrophic circumstances as recognized by a Member State. In addition, each of these operators must ensure that the maximum percentage of non-organic protein feed authorised per period of 12 months does not exceed 5%.

Hence, the use of compound feed containing a certain amount of non-organic protein feed introduced following a derogation linked to a recognition of a situation of catastrophic circumstances in a Member State should be strictly limited to the specific areas and operators of that Member State.

Finally, I would like to recall that, in order to be labelled organic, feed must comply with the provisions of Article 30 (6) of Regulation (EU) 2018/848 requiring in particular in its point (b) “*that all the ingredients of agricultural origin that are contained in the processed feed are organic*”. Compound feed containing non-organic agricultural

¹ Ares(2022)6519102

² [EUR-Lex - 32022R1450 - EN - EUR-Lex \(europa.eu\)](#)

ingredients may be labelled, under the rules laid down in Annex III to Regulation (EU) 2018/848, as a compound feed authorised in organic production.

The present opinion is provided on the basis of the facts related and questions asked during the Organic Production Committee of 21 September 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,

