



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability

Brussels
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Dear Madam,

I would like to thank you for your email of 15 February¹ asking questions about the labelling of feed premixtures as organic.

You explain in your email that you work for a manufacture of premixtures, as defined in Regulation (EC) No 1831/2003 on additives for use in animal nutrition². You mainly use flavouring compounds. You ask whether a premixture with a percentage higher than 5% of flavourings of non-organic certified compounds can be labelled as organic. For example, a premixture of 25% Orange oil non-organic certified, 25% Lemon oil non-organic certified and 50% of sunflower oil organic certified. You explain that, for you, as long as they are extracts from agricultural products and are in accordance with Regulation (EC) No 1831/2003, this is acceptable.

I understand from your request that you are placing on the market premixtures as defined in Article 2 (e) of Regulation (EC) No 1831/2003: “*premixtures’ means mixtures of feed additives or mixtures of one or more feed additives with feed materials or water used as carriers, not intended for direct feeding to animals;*”

Such premixtures are included in the definition of feed as set in Regulation (EC) No 178/2002 in its Article 3(4): “*‘feed’ (or ‘feedingstuff’) means any substance or product, including additives, whether processed, partially processed or unprocessed, intended to be used for oral feeding to animals;*”

Hence, the premixtures you are placing on the market are covered by the scope of the organic legislation Regulation (EU) 2018/848³; in addition to the obligation of complying with the relevant rules of Regulation (EC) No 1831/2003 on feed additives, if you want to label a premixture with the term “organic”, you have to ensure that all the relevant rules laid down in that Regulation for the production, the certification and the labelling of feed are complied with.

I would like to draw in particular your attention to the provisions of Article 30 of Regulation (EU) 2018/848 on the use of terms referring to organic production and its

¹ Ares(2022)1136611

² [CL2002R0178EN0090010.0001 cp 1..1 \(europa.eu\)](#)

³ [CL2018R0848EN0020010.0001.3bi cp 1..1 \(europa.eu\)](#)



paragraph (6) which states: “For processed feed, the terms referred to in paragraph 1 may be used in the sales description and in the list of ingredients, provided that:

(a) the processed feed complies with the production rules set out in Parts II, III and V of Annex II and with the specific rules laid down in accordance with Article 17(3);

(b) all of the ingredients of agricultural origin that are contained in the processed feed are organic;

and (c) at least 95 % of the dry matter of the product are organic.”

Indeed, it is important to distinguish between the fact that certain flavouring compounds which are only extracts from agricultural products are authorised to be used in organic production as sensory additives in Annex III Part B (2) to Regulation (EU) 2021/1165⁴ and the labelling as “organic” of premixtures containing such products.

In the example you gave, it seems that the product does not comply with the EU rules on organic production and cannot be labelled as organic.

On this basis, I would recommend you to contact the competent authorities of the Member State where your company is implanted so they can guide you further if you wish to label some of your products as organic.

The list of competent authorities on organic production in the EU is available at the following link:

[Control and enforcement | European Commission \(europa.eu\)](#)

This opinion is provided on the basis of the facts set out in your letter of 15 February 2022 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 faithfully,



⁴ [Publications Office \(europa.eu\)](#)