



Introduction organic agriculture

According to 2018/848 for the Scopes

- Organic Crop production
- Processing
- Trade
- Feed
- Group Certification

Organic Crop production:

What organic agriculture is:

- Avoids synthetic pesticides, easily soluble mineral fertilizers and genetically modified organisms (GMO)
- Protects the environment and promotes biodiversity
- Produces healthy food
- Recycles nutrients
- Uses locally adapted methods.

Soil fertility and plant nutrition:

- Soil fertility must be increased through the cultivation of legumes, green manure and the promotion of biodiversity, both on the field and under glass and in perennial crops.
- Hydroponic cultivation is not allowed
- Soil erosion must be avoided
- For annual crops, a wide crop rotation must be used, including legumes to assure biological nitrogen fixation
- For perennial crops, wherever possible, legumes should be planted as cover crops
- Organic manuring should be used to maintain soil fertility: From organic husbandry
- Nitrogen fertilizers and superphosphate are not allowed
- Rock phosphate, potassium sulphate, other fertilizers from mined origin and single trace element fertilizers can be used in case of proven deficiency
- Organic and inorganic fertilisation must not exceed crop requirements
- Lime (CaCO₃) can and should be applied, when necessary
- Plant strengtheners and preparations from microorganisms can be used.
- Fertilizers, soil improvers and nutrients that may be used in organic production are regulated in Annex II to Impl. Reg. (EU) 2021/1165.

Crop protection:

- Synthetic herbicides, insecticides, and fungicides are not allowed
- Pests and plant diseases must be prevented, using adapted species and resistant varieties, adequate crop rotations, and by promoting natural enemies
- After having taken these measures, only those natural or mineral substances may be used, which are listed in Annex I to Impl. Reg. (EU) 2021/1165
- Weeds must be controlled by mechanical or thermal means, adequate soil tillage and crop rotation.

Conversion period:

A conventional farm must undergo a conversion period before products can be sold as organic. During the conversion time, all rules of organic production must be kept, according to: EU Regulation.

Annual crops: 24 months until planting



Perennial crops: 36 months until harvest

Beginning of conversion period: Date of contract with the certifier, or date of first inspection

External control during conversion: Required

Exceptions: In case of sufficient proof for non use of prohibited substances during the previous years, conversion period may be reduced²⁾

Sale of products during conversion: From second year of conversion on, products can be labelled as "in conversion to organic farming"³⁾

2) Please note that applications for retroactive recognition of areas must be approved by the competent authorities (Reg (EU) 2020/464 Art. 1 Paragraph 2)

3) Products from third countries cannot be imported into the EU with an "in conversion" claim.

Records:

- Before the first inspection takes place, the farm must present an organic management plan to the certifier; this plan must be updated annually
- A farm diary must be kept, recording the main activities on each plot
- Invoices for purchase of fertilizers, pesticides, seeds, etc., must be filed
- Harvested quantities must be recorded for each crop
- The farm needs at least a simple system of bookkeeping for sales of organic products

Knowledge:

- The farmer must have a copy of the respective standards and must study them
- The farmer needs an adequate level of knowledge on organic farming rules and technologies.

Processing of organic food:

- Must assure traceability and transparency
- Requires a good documentation system
- Must not contaminate organic products through inappropriate post-harvest handling
- Restricts the use of additives and processing aids and does not allow GMOs for any purpose.
- Excludes the use of foods that contain or consist of engineered nanomaterials (Reg. (EU) 2018/848) and does not allow the use of ionizing radiation

Who needs to be certified as organic processor:

- All handlers who process, dry, freeze, clean, mix, pack, or label organic products after harvest, need to be certified. Acc. to European Regulation (EU) 2018/848 packaging or labelling operations are not considered as `processing`, but `preparation` operations.

Origin of organic raw materials:

- Only certified organic raw materials can be processed into organic products.
- Only EU certified raw material can be used for products for the EU market
- Beyond having copies of all relevant supplier certificates, processors must have a reliable procedure for ensuring that any product batch received with an organic claim, complies with the requirements. This includes, among others, verification of packaging, labelling, invoices and transport documents
- Processors must conduct a supplier risk analysis. Products from high risk suppliers should be subject to residue testing; supplier audits should be considered.

Separation:

- Some processors produce only organic, but most do both: organic and conventional.

- These latter handlers must set up a good system for separating organic products from conventional ones: from the moment of reception of the raw material, through all steps of processing, storage rooms, etc., until sale. Separation must also be safeguarded between organic and "in conversion" products, or products certified according to different standards (e.g. NOP / EU).
- The best separation, of course, is in space: separate warehouses and processing lines for organic.
- However, this may often not be possible; in this case, you can separate in time: you process organic at different times on the same line as conventional; before processing organic, you have to clean the line.
- In case of continuous processes (e.g. mills), the operator must ensure that at the beginning of organic processing, a reasonable quantity of organic product is used for "flushing" the line and sold as conventional.
- Where separate warehouses are not feasible, an adequate separation within the existing storage room may be sufficient: e.g. rows separated by a line on the floor, or separate shelves, properly labelled.

Documentation and labelling:

- An organic processor needs an organic management plan. In case the company has a quality management system, the quality handbook should contain a chapter referring specifically to processing of organic food.
- Wherever parallel production of organic and conventional products takes place, bags, containers, boxes with organic products have to be labelled, at all steps throughout your facility.
- The operator has to keep and file supplier certificates, waybills, reception notes, processing records, storage books, and invoices; all these records have to refer to "organic"
- For products certified equivalent or according to the EU standard, the GSCI certifier code should be used on all labels, delivery notes, invoices and other relevant documents related to organic sales.
- Organic processors need a good bookkeeping system, allowing evaluating whether the quantity of purchased raw material is consistent with the quantity of finished product sold.
- Except for open raw material arriving directly from the field, only packed or sealed and labelled products must be accepted for organic processing, unlabelled products should be returned to the supplier.

Post harvest pest control, sanitation, polluting substances:

- The operator must make sure that the organic product at no moment comes into touch with polluting substances, such as fuels, pesticides, wood preservatives, detergents, moulds etc.
- For pest control on stored products, only substances mentioned in Regulation
- The processor must take the necessary measures in order to avoid contamination by detergents, disinfectants or pesticides.
- Reg. 2018/848: Substances and products that may be used in the future for cleaning and disinfection are regulated in Article 5(3) of Implementing Regulation (EU) 2021/1165 (Annex IV Part C of Regulation (EU) 2021/1165).



The production rules of Regulation (EU) 2018/848 and its secondary acts are available in 24 languages (including French, Spanish, English and Portuguese) on the following link: [EU law - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu)

Enter the **regulation code** below in the [Quick search bar](#) to access the last valid version of the regulation.

2018/848 : Regulation on organic production and labelling of organic products

2021/1165 : List of products and substances for use in organic production

2021/1698 : Rules for recognition, supervision, and control of control bodies in third countries

2020/464 : Rules on retroactive recognition of the conversion period, rules for animal production, rules for processed food and feed

2020/2146 : Exceptional production rules in organic production

2022/474 : Requirements for production and use of non-organic, in-conversion and organic seedlings and other plant reproductive material

2021/2306 : Rules on the certificate of inspection and on official controls of consignment of organic and in-conversion products to be imported into the Union

2021/2325 : List of third countries, control authorities and control bodies recognized Art. 33(2) and (3) of Regulation EC n° 834/2007 for import into the Union