**EU ORGANIC PRODUCTION AND LABELING: A PRIMER FOR CROP PRODUCERS**

Organic production is a sustainable management system promoting enhancement of ecosystems and biodiversity through respect for nature’s systems and cycles and responsible use of energy and natural resources. It ensures organic integrity at all stages of production, preparation, and distribution to meet consumer demand for high-quality food, and agricultural and aquaculture products that promote the health of the environment, humans, plants, and animals.

[Regulation (EU) 2018/848 and its related delegated and implementing acts](https://agriculture.ec.europa.eu/farming/organic-farming/legislation_en) went into effect on 1 January 2022. Operators in third countries that are currently certified to an equivalent standard must achieve certification to these new requirements no later than December 31, 2024, to continue marketing organic products to the EU.

**Management of the Holding.** A ‘holding’ consists of all agricultural production units operated under one system of management. An operation’s entire holding must be managed in compliance with organic production requirements, except that a holding may be split into clearly and effectively separated production units for organic, in-conversion and non-organic production when different varieties that can be easily differentiated are produced on the non-organic production units, except that the requirement for different varieties does not apply to research and educational centers, plant nurseries, and seed multipliers. An operator can request a derogation to produce the same varieties of non-organic or in-conversion crops, or different varieties that cannot be easily differentiated only when there is a plan to convert all units to organic production as soon as possible and with additional certifier oversight of the harvest to ensure effective separation.

**Authorized substances.** All substances used in organic and in-conversion crop production, or stored on organic and in-conversion units must be authorized for use in organic production and used in accordance with specific conditions and limits as set forth in Regulation (EU) 2018/848 and Annexes I and II of Regulation (EU) 2021/1165. Operators shall keep records on the need for use; the parcel location, crop, the date(s) each product was used, the name of the product, and the amount applied. In the case of plant protection products operators must also document active substances and the pest or disease to be controlled.

**Soil Management.** Organic producers must maintain and enhance soil life and biodiversity, fertility, stability and water retention; limit the use of non-renewable resources and external inputs; and recycle waste and by-products of plant and animal origin. Annual crop producers must practice multiannual crop rotation with leguminous crops as the main cover crop, as well as other green manure crops. Greenhouses and perennial crop producers must use short-term green manure crops and legumes as well as plant diversity. In all cases, organic producers should apply livestock manure or organic matter, preferably composted and from organic production. Manure from factory farms is prohibited. The total amount of livestock manure must not exceed the rate of 170 kg of nitrogen per hectare per year. All fertilizers, soil conditioners and nutrients used in organic production must be listed on Annex II of Regulation (EU) 2021/1165.

**Pest and Weed Management.** Organic producers should rely primarily on protection from natural enemies and biological controls, choosing species and varieties that resist pest pressure, crop rotations, cultivation techniques and thermal processes. Only the active substances included on Annex I of Regulation (EU) 2021/1165 may be contained in plant protection products used in organic production when plants cannot be adequately protected from pests by preventive practices, and only in accordance with the specified conditions and limits. Operations using copper-based plant protection products must ensure that the total application over a period of 7 years does not exceed 28 kg of copper per hectare.

**Plant Reproductive Material.** In accordance with Annex II (1.8.1) of Regulation (EU) 2018/848, only organic plant reproductive material shall be used for the production of organic plants and plant products. This requirement applies to all plant reproductive material, including cover crops. Organic operators in third countries may use both organic and in-conversion plant reproductive material obtained from within their own holding provided that it is allowed under applicable national organic legislation. By way of derogation from point 1.8.1, operators in third countries may use non-organic plant reproductive material authorized in accordance with point 1.8.6 when organic plant reproductive material is justified to be not available in sufficient quality or quantity in the territory of the third country in which the operator is located. The operation must obtain written authorization from QCS to use non-organic plant reproductive material for each crop or cover crop before the sowing or planting of the crop. Authorization is only valid for one season at a time.

**Recordkeeping.** Operators shall keep records regarding all organic and in-conversion production activities occurring on the parcels, including amounts harvested and records of all external inputs used on each parcel. Operators must also maintain records concerning any derogation from production rules obtained in accordance with point 1.8.5.

**Labeling** **(EU) 848 Article 30.** QCS must verify compliance of all labels used and intended for use on EU organic products, packaging, containers, and commercial documents as applicable, including products subsequently handled by another operator prior to export to the EU. Annex III of (EC) No 2018/848 describes the compulsory indications required on product to be imported into the EU and for verification by the importer. References in relation to organic shall be easily visible, clearly legible, and indelible. All labels (retail and non-retail) must use the code number of the control body (certifier) who has carried out the most recent production or preparation of the product. Operations outside the US, use “<country code>-BIO-144.” US operations use “US-ORG-51.” Click here for a list of [country codes](https://www.iso.org/obp/ui/#search). Refer to [the organic logo (europa.eu)](https://agriculture.ec.europa.eu/farming/organic-farming/organic-logo_en) for details on the use of the EU organic logo.

**Conversion to organic production.** Before crop products can be certified organic, the operator must apply all EU organic production rules during a conversion period of at least two years before sowing the crop or at least three years before the first harvest of perennial crops. In the case of grassland or perennial forage, EU organic production rules must be applied during a period of at least two years before its use as organic feed. QCS recognizes the start of the conversion period as the date when the operation submits the organic system plan and applicable fees. Products that have been harvested from land or from perennial crops that have been under organic management for 12 months or more may be labelled as “in-conversion.”

**Retroactive recognition of a previous period as part of the conversion period.** QCS may retroactively recognize a previous period that was not under the oversight of an organic certifier as being part of the conversion period in very limited cases and only when the operator can prove that the land parcels were natural or agricultural areas that have not been treated with substances not authorized for use in organic production for a period of at least three years. Refer to the QCS Organic Certification Manual for documentary and inspection requirements to demonstrate eligibility for retroactive recognition in accordance with Article 10(3) of Regulation (EU) 2018/848.

**Controls.** All operations must undergo an initial and annual on-site inspection by the certification body to compliance with the organic production and labeling rules. Operations may be subject to additional controls at the discretion of the certification body or European Commission, including unannounced inspections and/or sampling.

**This document is a general summary of the EU organic production and labeling rules. It is not intended as a substitute for a complete reading and understanding of the regulations. QCS is recognized by the European Union in Regulation (EU) 2021/2325 and pursuant to Regulation (EU) 2018/848 as a control body for the purpose of importing organic products into the Union. Certification services by QCS are limited to evaluation of compliance with organic regulations and provision of technical assistance in the form of general information like this document. QCS does not provide consultation services.**