

CELCAA comments on Commission proposal for a regulation amending Reg 2018/848 as regards certain production, labelling and certification rules on trade with third countries

The current system of organic equivalence agreements with third countries has functioned effectively and should be preserved. Through these agreements, the European Union has carefully assessed the organic control systems of partner countries and recognised them as equivalent where they provide comparable levels of assurance. This framework enables EU consumers to access a diverse range of organic products from trusted partners, while maintaining the integrity of the EU organic label.

It is important to recall that equivalence does not mean identical rules, but rather comparable outcomes and guarantees. The equivalence approach reflects the reality that different regulatory systems can achieve similar objectives through different means. This principle has underpinned the EU's organic trade policy for many years and has supported the development of stable and predictable trade relationships with key partners.

EU organic exporters also benefit significantly from reciprocal treatment in third-country markets. Many partners provide equivalent access for EU organic products based on these arrangements. Any unilateral modification by the EU risks undermining this balance and could lead to retaliatory measures or a reconsideration of the treatment afforded to EU exports abroad. In particular, such changes would clearly expose the EU to retaliatory measures by trading partners and have the potential to disrupt trade in high-value, quality organic products that currently flows under these arrangements.

Furthermore, the proposed introduction of a 5% threshold would create significant disruption for EU processors. Under this approach, an organic product using organic ingredients imported from a country recognised under an equivalence agreement would not be permitted to bear the EU organic logo if the final product contains more than 5% of such ingredients. In practice, this would severely constrain the use of organic ingredients sourced from trusted partner countries and risk dismantling established supply chains that EU processors rely on to produce a wide range of organic foods.



In this context, the proposal appears to go beyond what is required following the judgment in the Herbaria case. In practice, it would amount to a unilateral modification of existing agreements with eleven partner countries. Such a step could create unnecessary uncertainty in international organic trade, disrupt supply chains for EU operators, and potentially weaken the market access currently enjoyed by EU exporters.

For these reasons, careful consideration should be given to preserving the current equivalence framework and avoiding changes that could undermine well-functioning agreements, disrupt established supply chains, or provoke unintended trade consequences.

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