



Training Handbook: The New EU Organic Regulation (2018/848) for Producer Groups

Part 2: Organic Production Rules

Version: November 2022

This handbook has been developed by FiBL as part of an Alliance for Product Quality in Africa project supported by GIZ & Gepa



Content training handbook – part II

- 2.1 Organic plant production rules
- 2.2 Organic and non-organic production units & activities
- 2.3 Processing & traceability in a Group of Operators

Acknowledgement: the content in this section is based of the IFOAM Guidance on the new EU regulation for Producer groups (2022), which has been developed jointly by IFOAM Organics International, IFOAM Organics Europe and FiBL.



2.1. Organic crop production rules



Organic production rules for Group of Operators

The relevant organic rules for the group's members can be summarized in simpler “internal production rules”, which are checked & confirmed by the CB.

- **ICS manager needs to be aware of the EU organic regulatory production rules**
 - may need to look up specific sections of 2018/848 & secondary regulations referenced in this training
 - clarify with CB in case of doubt.
- **ICS inspectors need training in the internal organic production rules** plus additional clarification / details if relevant
- **Farmers need to understand the basic requirements (Do's and Don'ts)**, but mainly need training & support in organic production.



Overview of organic production rules applicable to groups of operators in Third Countries and their members

What production rules apply to our organic farm members or to us as a group of operators?



The most important production rules of Regulation 2018/848 are in

- **Part III of the Regulation: Art 9 to 12**
- **Annex II, Part I Plant Production Rules**
- + **several related secondary acts, especially**
 - Reg 2021/464 on planting materials & recognition of conversion
 - 2021/1165 on authorised substances
- **Control in Third Countries: 2021/1698:** especially Art 10 & 24

Note: Reading the regulatory texts is complex. Some specific rules/procedures apply only to operations in EU member states. Some articles include a specific section applicable to “Third countries”, whereas for others, relevant rules for application in Third Countries under the “compliance scheme” are indicated in the Regulation on Control in Third Countries 2021/1698. Some articles may apply to operators but not necessarily to “groups of operators”:

→ Summary of applicable rules and more detailed references are indicated in this handbook

Overview of changes in organic crop production rules

There are some changes with regard to some of the crop production rules, but the basic rules relevant for small producers have not changed so fundamentally.

Rules that have become stricter:

- **retroactive recognition** of conversion period
- **Use of non-organic seeds and planting materials**
- **requirements on crop rotation & crop diversity**
- **New lists of authorized substances:** more restrictions and less flexibility
- **Documentation and separation of production units** for members in GoO



The most significant change for operations will be that the detailed EU crop production rules will need to be met in a “compliant way”, no longer in an equivalent way! Depending on certifiers’ application of the EU rules, this may imply some significant changes.

General requirements for plant production

Organic crops, except those which are naturally grown in water, **shall be produced:**

in living soil

or in living soil mixed with materials allowed in organic production

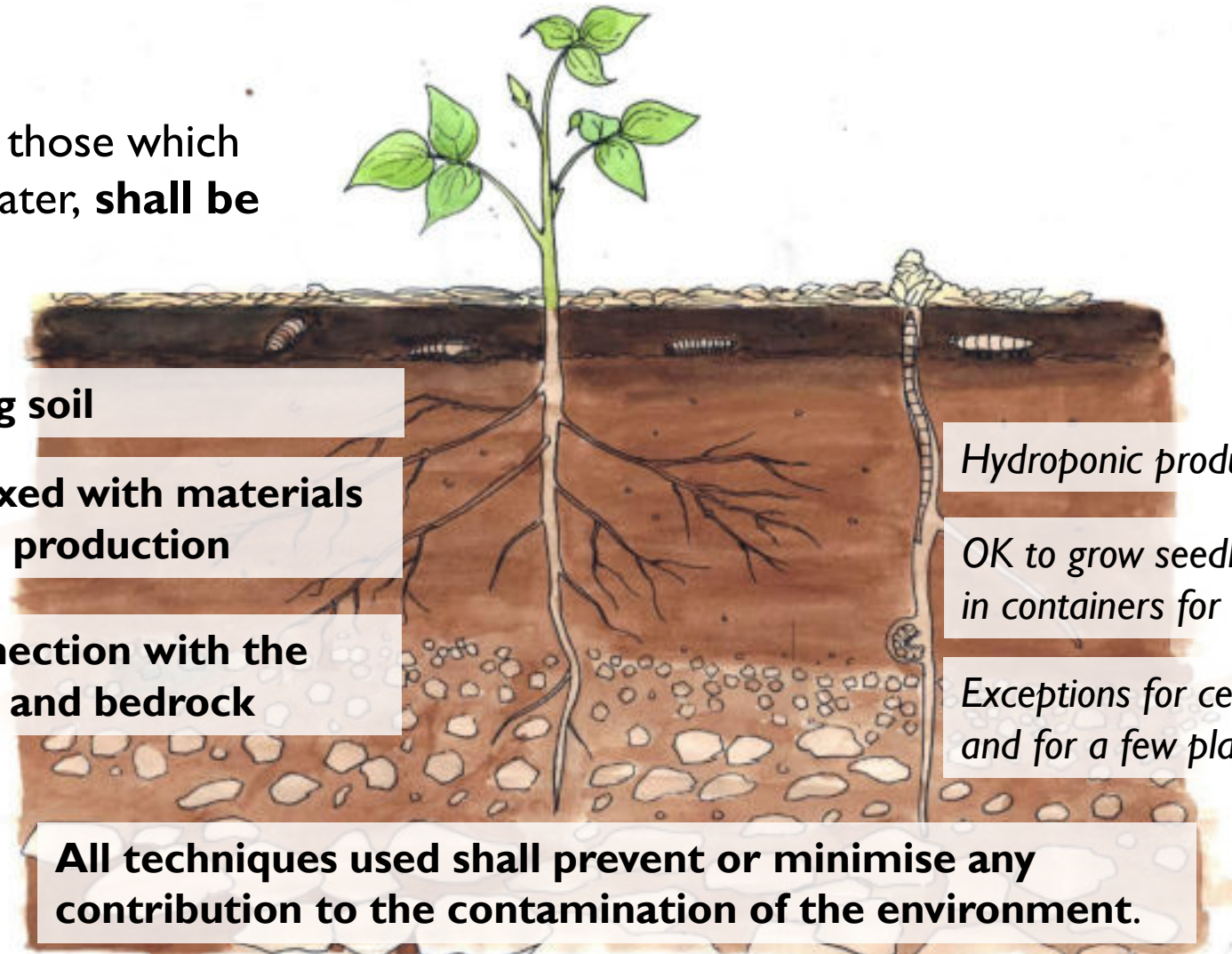
in connection with the subsoil and bedrock

Hydroponic production is prohibited

OK to grow seedlings or transplants in containers for later planting,

Exceptions for certain plants in pots and for a few plants

All techniques used shall prevent or minimise any contribution to the contamination of the environment.



Origin of plants & plant reproductive materials

For production of organic plants and plant products, only **ORGANIC** plant reproductive material (PRM) shall be used.

- “Plant reproductive material” means plants and all parts of plants, including seeds, at any stage of growth that are capable of, and intended for, producing entire plants.
- **If from the farmer’s own holding:** Use of organic and in-conversion PRM permitted.

Organic Plant Reproductive Materials (PRM):

- **the mother plant** is under certified organic production for at least one generation, or, in the case of perennial crops, for at least one generation during two growing seasons.
- **All multiplication practices** shall be carried out under certified organic management
- Specific additional rules apply for producing RPM to be sold as an organic product (art 13, Annex II, I.8)



Operators shall give preference to organic RPM suitable for organic agriculture.

Reg 2018/848 Annex II, Part I, I.8

Amended by Reg. 2022/464

Exceptional use of non-organic plant reproductive material (PRM)

If organic PRM is not available → in-conversion PRM shall be used
No authorisation needed in third countries.



Use of untreated non-organic PRM in an organic or in-conversion production unit in a third country may be authorised by the CB:

- **Only when organic or in-conversion plant reproductive material is not available** in sufficient quality or quantity in the third country (of the operator)

Note: difference to EU - within the EU use can be authorized only in case of confirmed un-availability in official databases

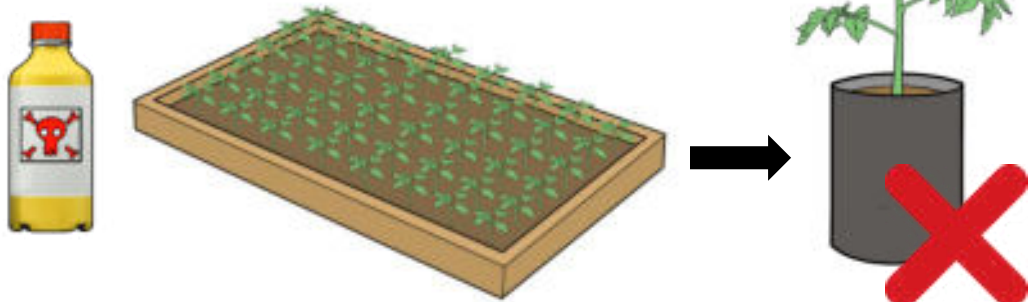
- **Must be authorized BEFORE** sowing or planting
- **Authorisation granted only for one season** at a time; CB to keep list of quantities authorised

Reg. 2018/848 Annex II, Part I, 1.8. 5.2
As amended by Reg. 2022/464

Conditions for exceptional use of non-organic PRM



The non-organic PRM (incl. seeds!) may not be treated after harvest with plant protection products other than authorized for organic production
If treated seeds are used in the organic unit (even for intercrops that are not sold as organic) → land needs to undergo conversion.



Non-organically grown SEEDLINGS are not permitted!
= young plants from the germination of seeds and not from cutting.
Only species that have a cultivation cycle completed in one growing season, from the transplantation of the seedling to the first harvest of product.

- **Seedlings must be grown in line with organic rules**
- **The seeds used to grow the seedling shall be organic, but use of non-organic untreated seeds may be authorised by CB as "organically usable" seedling (can not be sold as "organic seedling")**

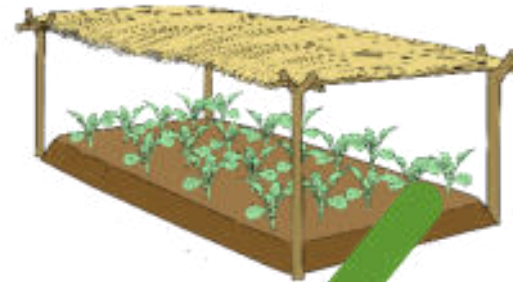
Reg. 2018/848 Annex II, Part I, 1.8.5.3

Implications for Groups of Operators and the ICS

ICS must inform members & ensure that :

- for all certified organic crops only organic PRM or seeds may be used **OR** specified untreated non-organic seeds/PRM as approved by the CB for the coming season.
- Seedlings for organic crops **MUST** be grown in compliance with organic rules

No use of seeds treated with unauthorised substances in organic fields (including crops not sold to the group)!



The ICS must check in internal inspection :

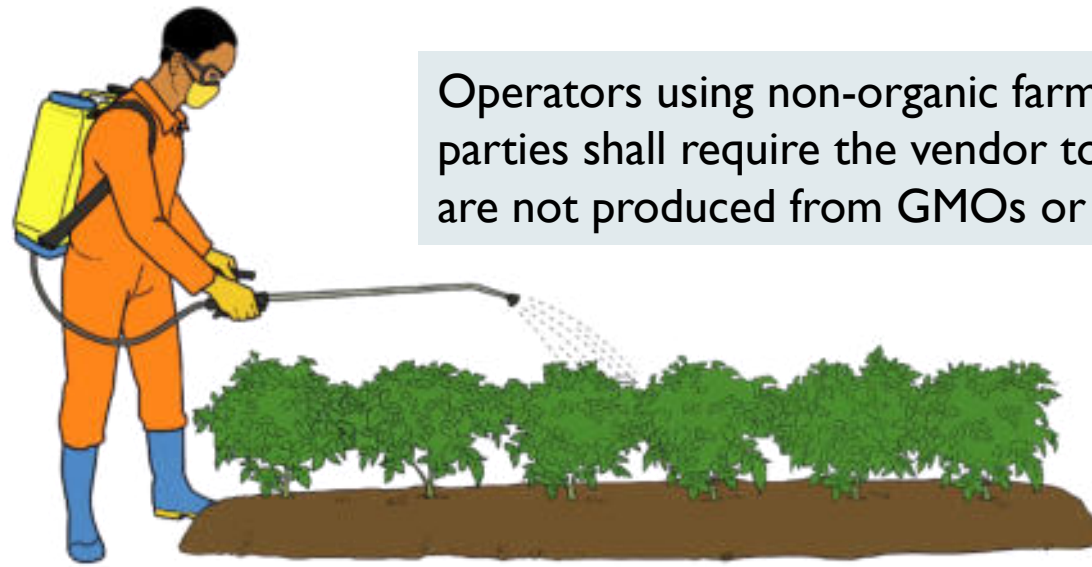
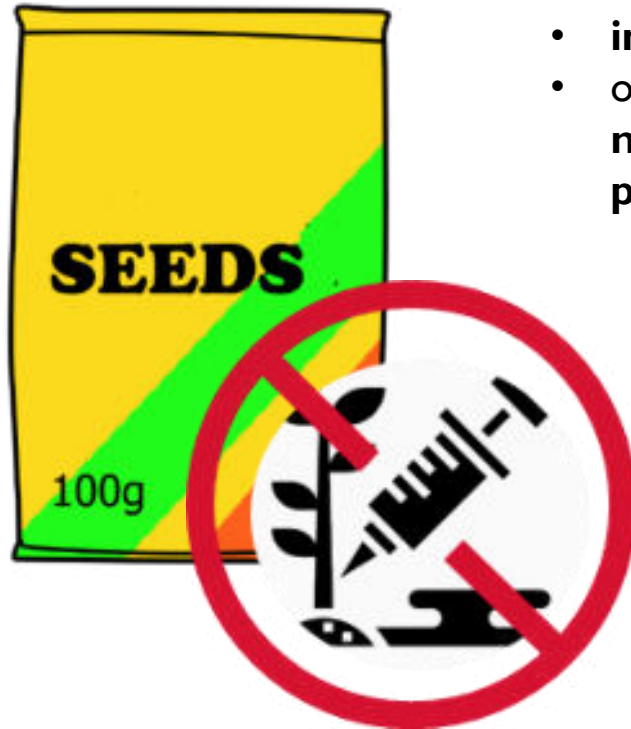
- ✓ use of organic seeds/PRM for all organic crops sold to the group
- ✓ and that **NO** treated seeds used in the entire organic unit (any crop)

Note: GoO may need to support members to produce or source organic seeds/planting material

Prohibition of the use of GMO

GMOs, products produced from or by GMOs, shall not be used

- in organic food or feed
- or as plant protection products, fertilisers, soil conditioners, plant reproductive material, micro-organisms, food, feed, processing aids, or animals in organic production



Operators using non-organic farm inputs purchased from third parties shall require the vendor to confirm that those products are not produced from GMOs or produced by GMOs.

Reg. 2018/848 Art. 11

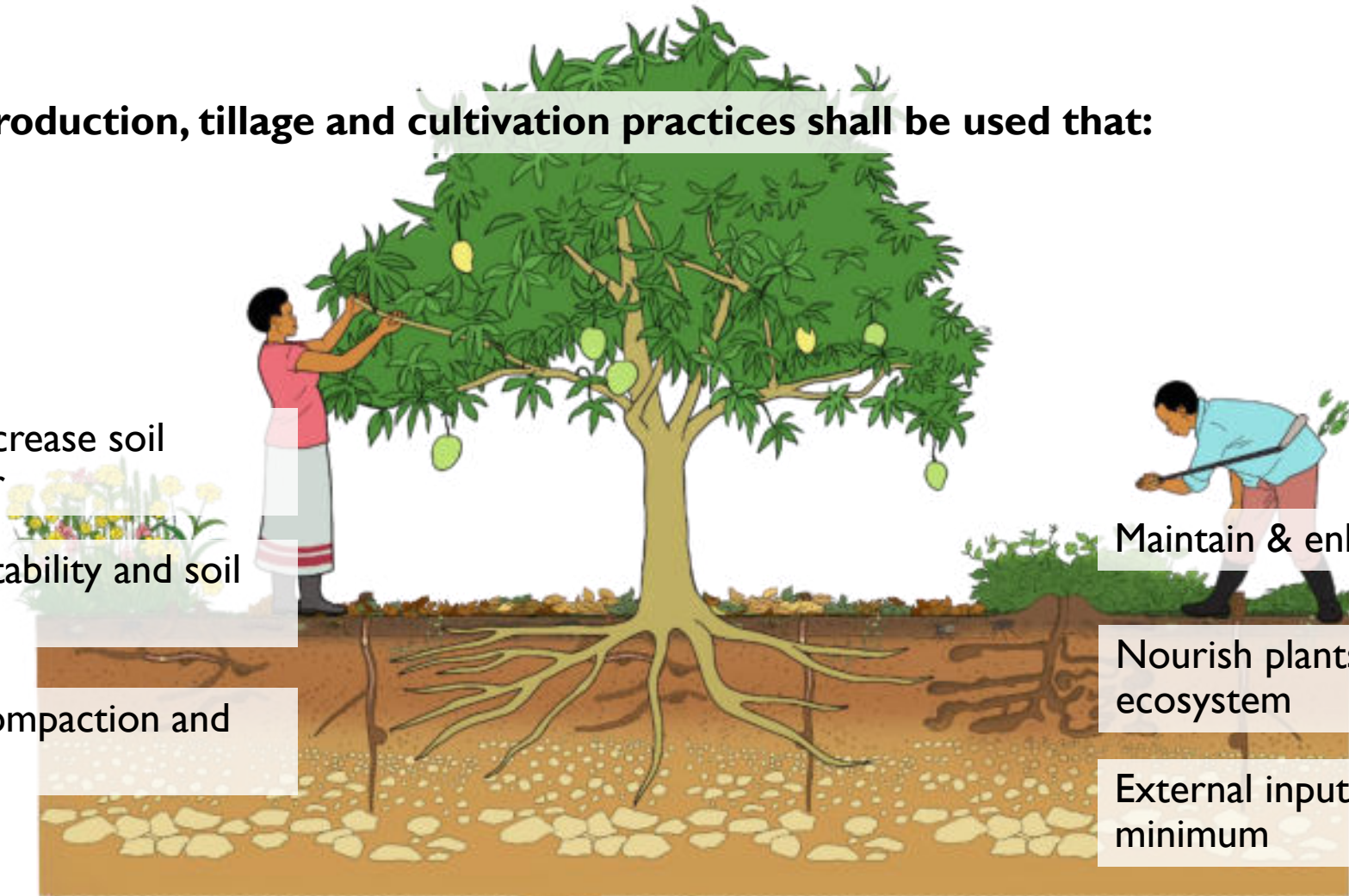
Organic soil management principles

In organic plant production, tillage and cultivation practices shall be used that:

maintain or increase soil organic matter

enhance soil stability and soil biodiversity

prevent soil compaction and soil erosion



Maintain & enhance soil life

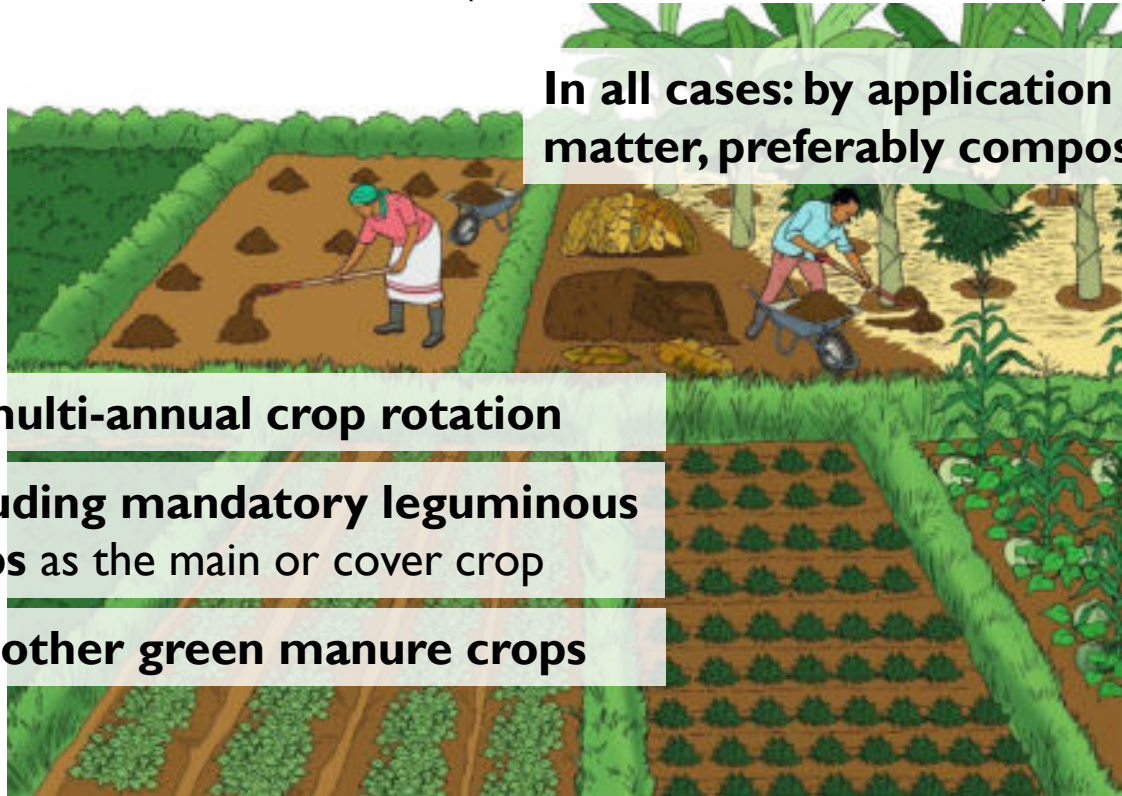
Nourish plants primarily through soil ecosystem

External inputs shall be kept to minimum

Crop rotation to maintain & increase soil fertility

The fertility and biological activity of the soil shall be maintained and increased :

ANNUAL CROPS (except grassland and perennial forage) :



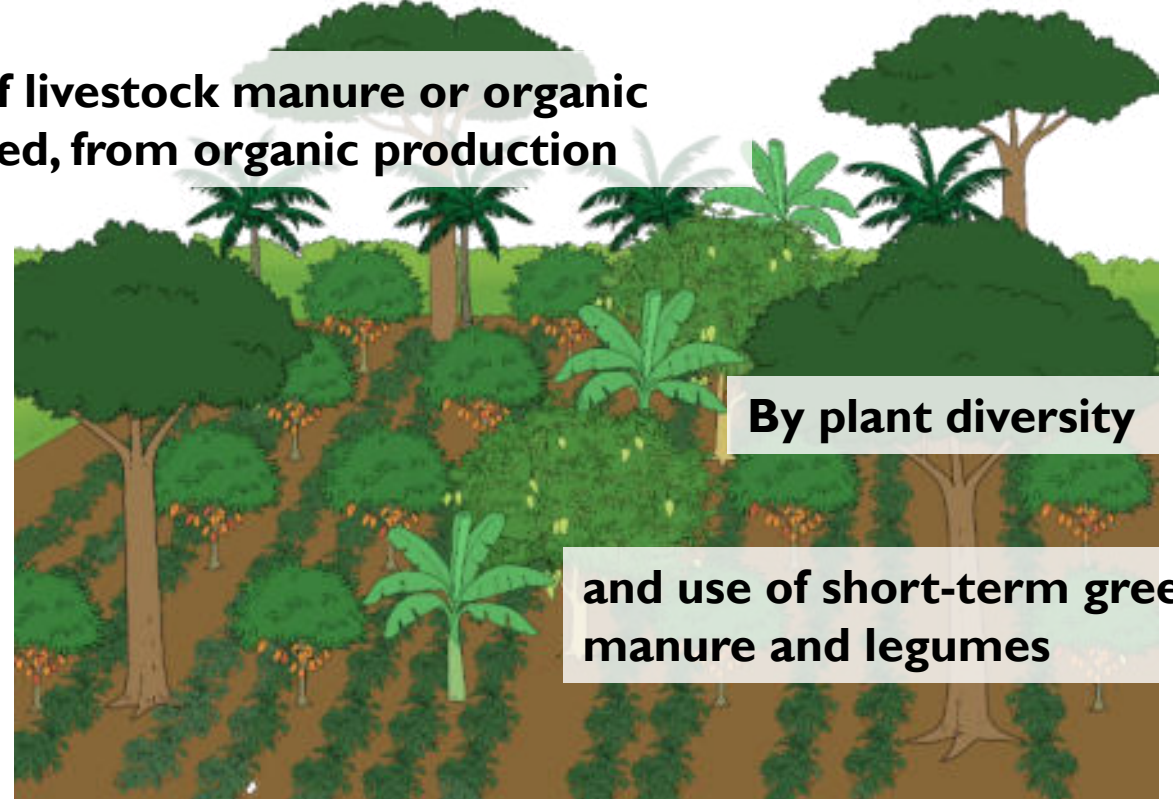
In all cases: by application of livestock manure or organic matter, preferably composted, from organic production

by multi-annual crop rotation

including mandatory leguminous crops as the main or cover crop

and other green manure crops

PERENNIAL CROPS (& greenhouse crops) :



By plant diversity

and use of short-term green manure and legumes

Use of fertilizers & soil conditioners

Total amount of livestock manure: < 170 kg Nitrogen per ha per year

Preparation of micro-organisms & biodynamic preparations may be used



For compost activation: plant based preparations & micro-organisms may be used

Only if the nutritional needs of plants can not be met by crop rotation & application of livestock manure or organic compost



Use of fertilizers and soil conditioners authorized for use in organic production (listed in EU Regulation 2021/1165)

Authorized organic fertilizers (Reg. 2021/1165)

Only the products and substances listed in Annex II Regulation 2021/1165 may be used in organic production as fertilisers and soil conditioners for plant nutrition, some according to specific conditions, e.g. :

Composted or fermented mixture of vegetable matter; vermi-compost

Animal manures (all not from factory farming):

- Farmyard manure; dehydrated poultry manure, composted animal excrements
- Liquid animal excrements, Guano

Products & by-products of plant origin. e.g. oilseed cake, cocoa husk

EXAMPLES
on the list



Products & by-products of animal origin (*not applied to edible part of plant; no Chromium detectable*)
e.g. Blood meal, horn meal, bone meal

Micrororganisms *to improve soil conditions or nutrient availability*

Saw dust, wood chips, composted bark, wood ash (*wood not chemically treated*)

For details and complete list see :

Reg. 2021/1165, Annex II

For complete list with all details see Regulation 2021/1165 Annex II

Authorized soil conditioners (Reg. 2021/1165)

Only the products and substances listed in Annex II Regulation 2021/1165 may be used. Various restrictions apply (e.g. minimum content nutrients, max level contamination), please check in Annex II.

Soft ground Rock Phosphate
Aluminium Calcium Phosphate
Basic Slag (Thomas Phosphate)

Calcium carbonate (chalk, ground limestone)
Industrial Lime from sugar production of vacuum salt production only.

Elemental Sulphur

Inorganic Micronutrient Fertilizers

EXAMPLES
on the list



Potassium sulphate, magnesium sulphate, calcium sulphate

Stone meal, clay minerals, organic rich sediments of freshwater bodies

Bio-Char

Xylite, Leonardite (mining by-products)

Humic & fulvic acids

Any off-farm input products will need to be authorized by the CB for use in the group.

Organic pest & disease management principles in regulation

The prevention of damage caused by pests and weeds shall rely primarily on the protection by:

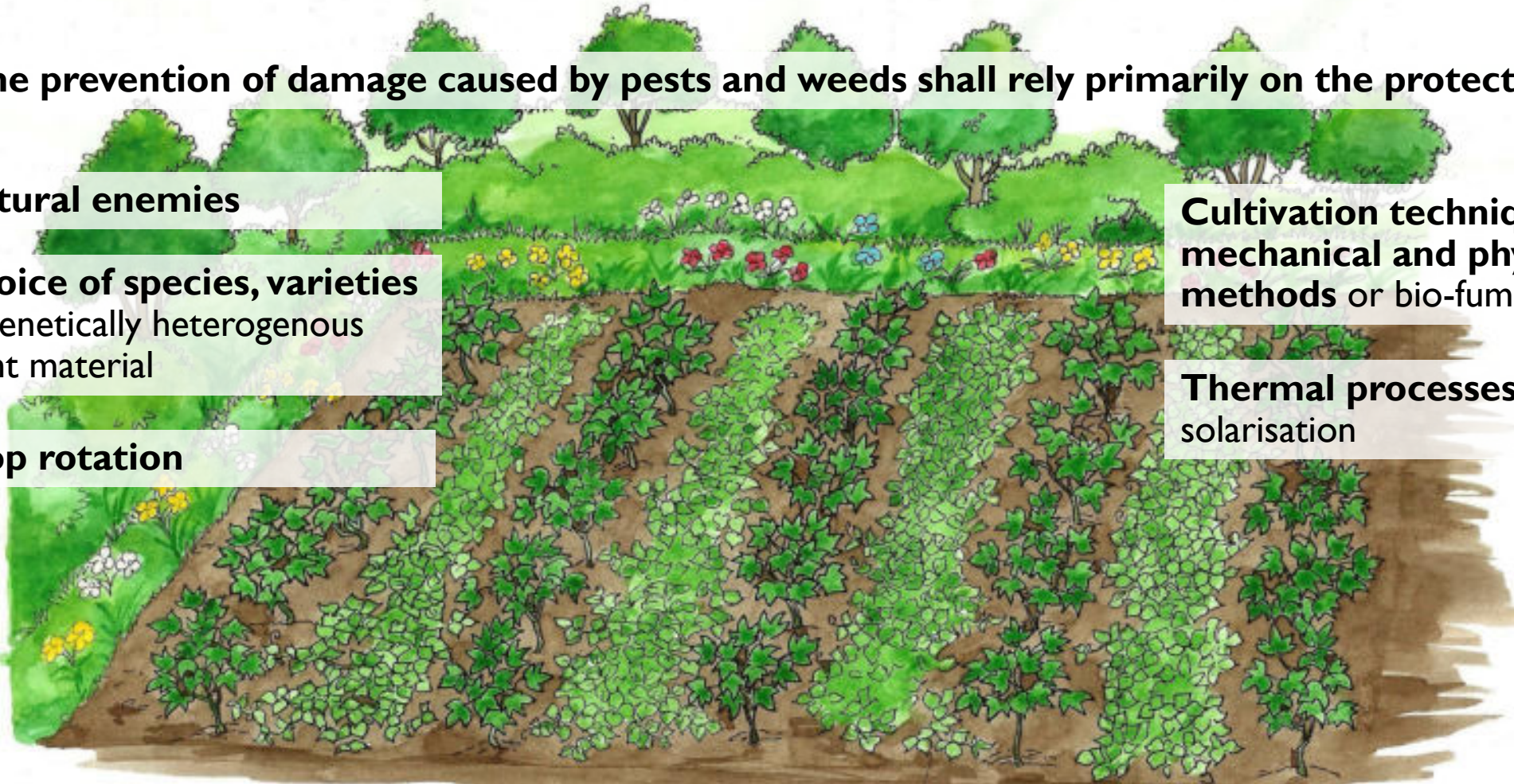
Natural enemies

**Choice of species, varieties
& genetically heterogenous
plant material**

Crop rotation

**Cultivation techniques such as
mechanical and physical
methods or bio-fumigation**

**Thermal processes such as
solarisation**



Organic pest & weed management in regulation - 2

Only where these measures are not sufficient or in case of an **ESTABLISHED** threat to the crops, products & substances authorized in Annex I of Reg. 2021/1165 may be used.

Only “to the extent necessary”

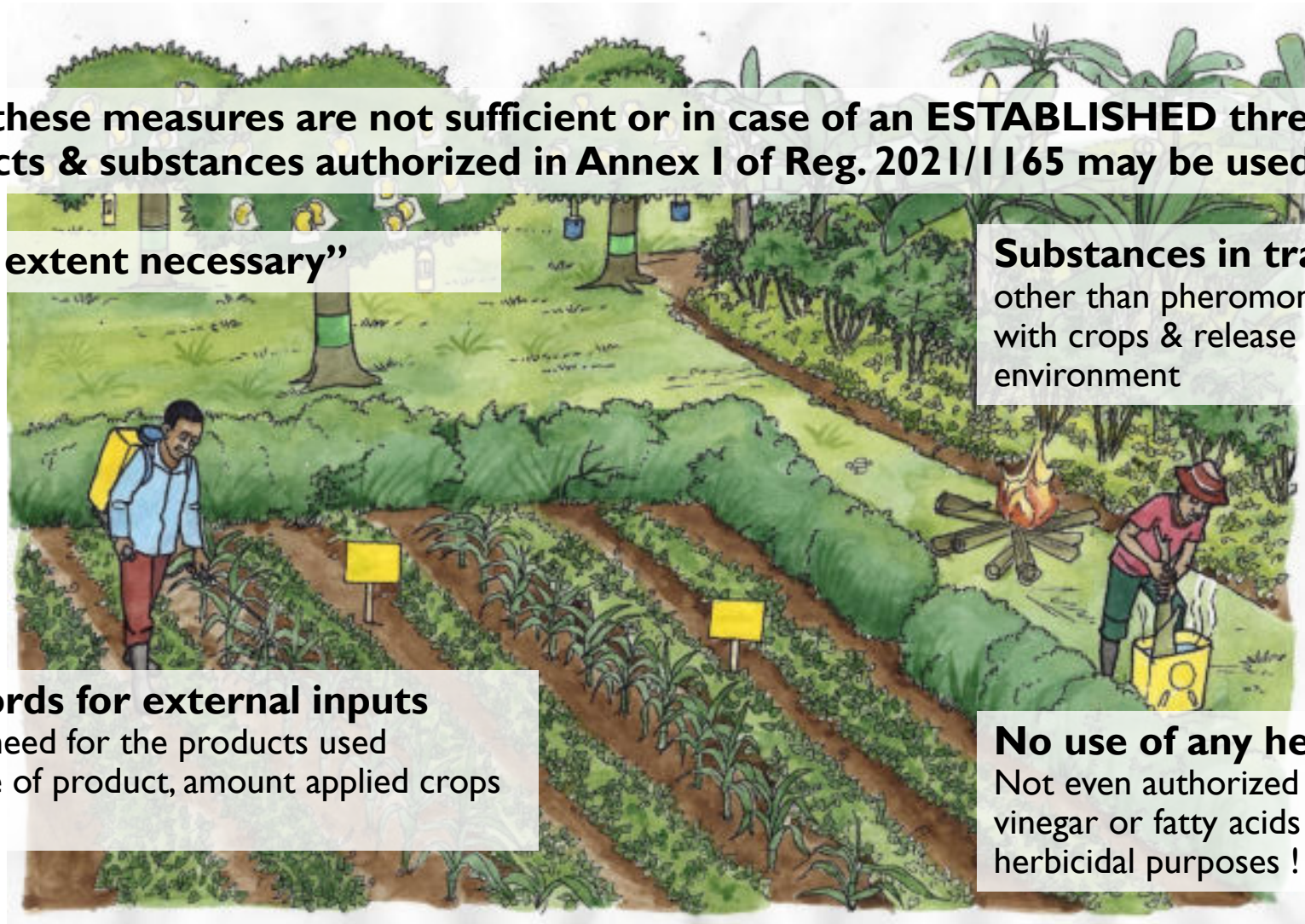
Substances in traps & dispensers, other than pheromones: prevent contact with crops & release of substances into the environment

Keeping records for external inputs

- Proving the need for the products used
- Date & name of product, amount applied crops & parcels

No use of any herbicides!

Not even authorized substances like e.g. vinegar or fatty acids can be used for herbicidal purposes !



Organic pest & weed management on smallholder farms

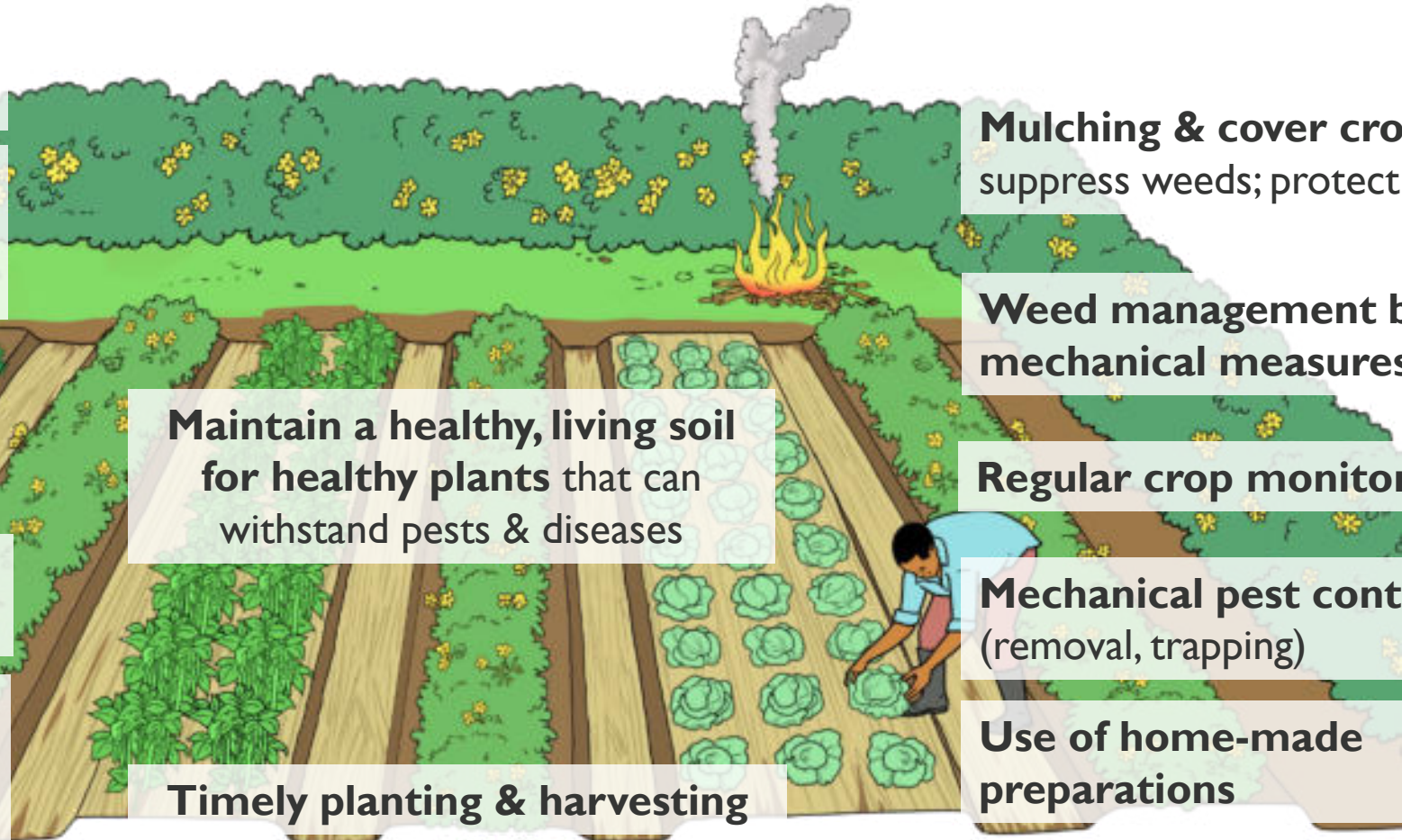
Use of well adapted & pest resistant varieties

Crop rotation is important to prevent build-up of pest populations, diseases & weeds!



Intercrops contribute to fewer pests & weeds!

Promote biodiversity & beneficial insects;
Trap cropping



Mulching & cover crops suppress weeds; protect soil

Weed management by mechanical measures

Regular crop monitoring

Mechanical pest control
(removal, trapping)

Use of home-made preparations

Maintain a healthy, living soil for healthy plants that can withstand pests & diseases

Timely planting & harvesting

Authorized substances for plant protection (Reg. 2021/1165)

Only the products and substances listed in Annex I of Regulation 2021/1165 may be used

IMPORTANT: many substances have very specific & new conditions. Substances must be EU authorized for use in EU agriculture in general, specific conditions apply (EU pesticide data base for active substances; Reg. 540/2011)

→ Any off-farm products must be certified (or carefully evaluated) & approved by CB before use!

Examples of allowed substances

Specified “Basic substances” from plant and animal origin and based on food e.g. vinegar, whey, sunflower oil, onion oil, sodium chloride, cow milk, allium extract.

Microorganisms including viruses:
not GMO. Only if *strain* is EU authorized and listed in Reg. 540/2011.

Reg. 2021/1165, Annex I
Reg. 540/2011 (Consolidated updated version 2022)

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Oils: citronella, clove, rape seed, spearmint, orange, tea tree,
Azadirachtin (from neem) , **Pyrethrins** from plants
Repellents by smell of animal or plant origin
Pheromones in traps/dispensers

Sulphur; lime sulphur
Copper oxide, oxychloride, hydroxide;
Bordeaux mixture, tribasic copper sulphate
Paraffin oils
Kaolin (aluminium silicate), **diatomaceous earth**
Ethylene (only bananas, potatoes; citrus)
Spinosad

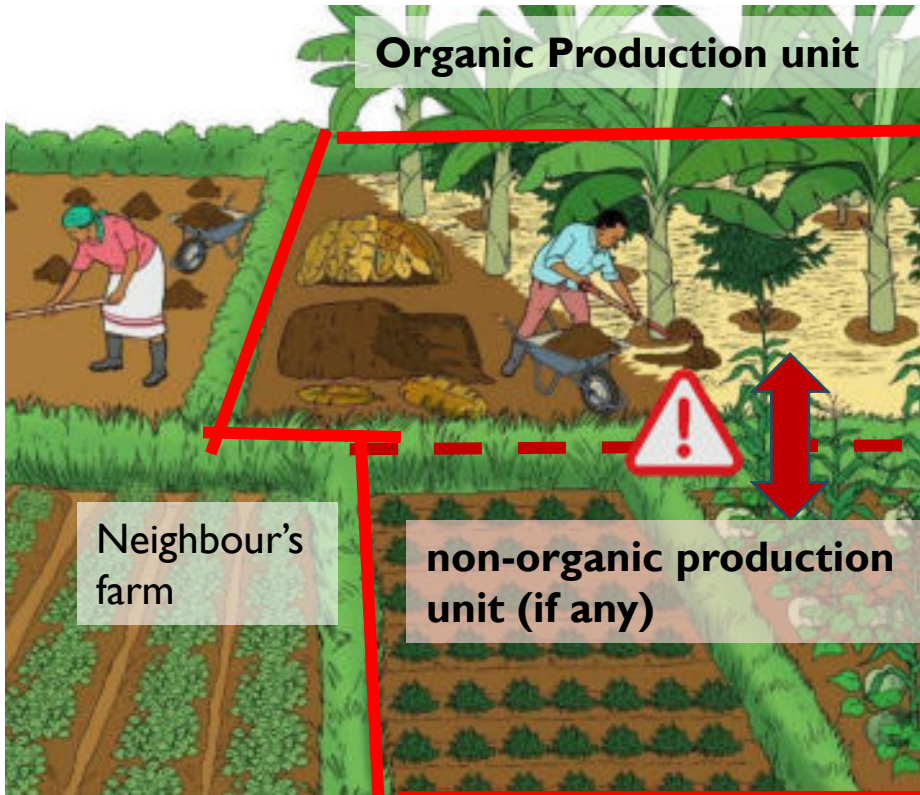


2.2. Production units of members and conversion



Member's holding & production units

The entire holding shall be managed organically. Alternatively, it is permitted to split the farm holding into clearly and effectively separate “production units “ = land parcels (Art 9.2&9.7):



Organic or in-conversion unit

- ✓ all crops in these units (on the organic or in-conversion plots) must be managed in line with the organic production rules!
- ✓ all land for production of organic crops shall be in the organic unit, including rotation land.
- ✓ New: in-conversion unit must be separate from organic unit

Non-Organic Unit (normally for other crops; not sold to the GoO)

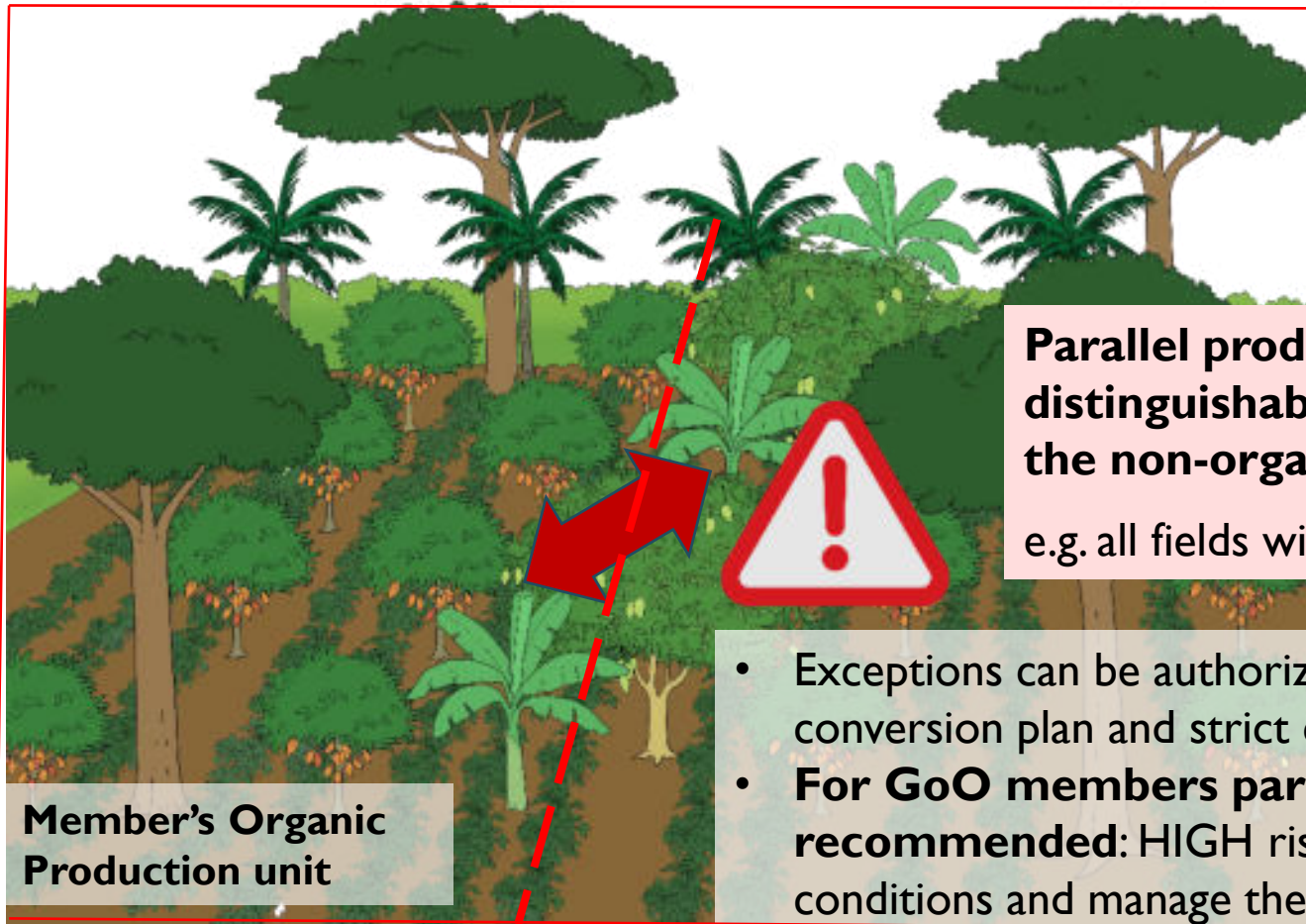
- ✓ All non-organic fields & crops managed by the member need to be registered by ICS and all details listed in the GoO List of Members.

The ICS needs to register the member's entire farm holding under the management of the member - not just plots with crop(s) sold to the Group.

Reg. 2021/279 Art 5 (GoO list of members)

Reg. 2018/848 Art 9.2 & Art. 9.7

Organic & non-organic crops grown by a member



Member's Organic Production unit

Parallel production of the same crop (not easily distinguishable variety) in the organic or in-conversion and the non-organic farm unit is generally not permitted.

e.g. all fields with cocoa trees shall be managed organically.

- Exceptions can be authorized only for perennial crops, for limited time under a conversion plan and strict conditions (→ detailed rules in Art 9.8)
- **For GoO members parallel production (of perennial crops) is not recommended:** HIGH risk, increases control; most ICS unable to meet conditions and manage the high risks

Conversion of land parcels to organic (plant production)



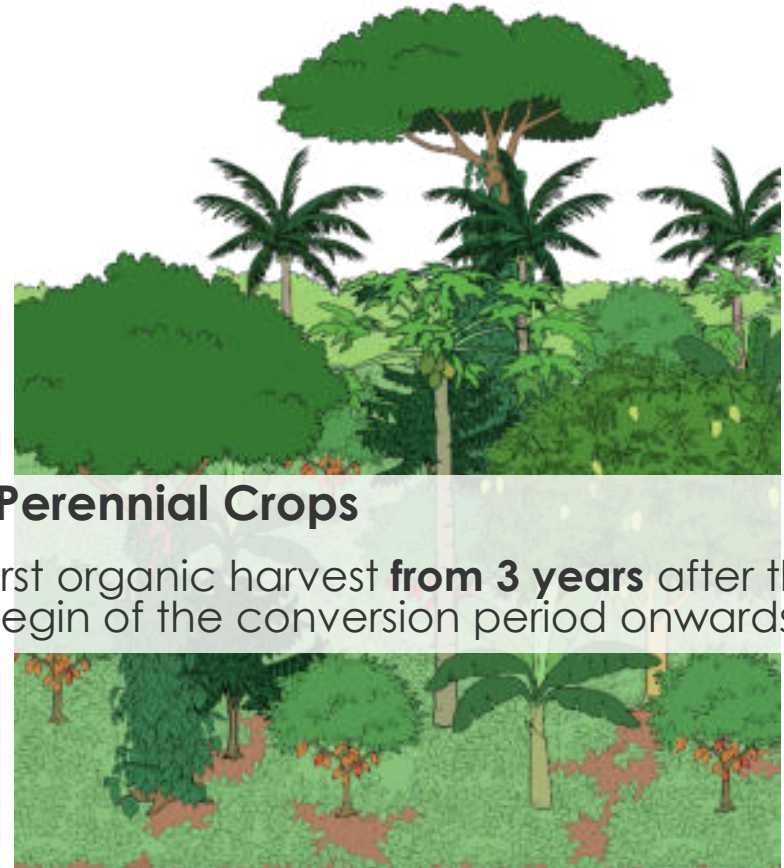
For Annual Organic Crops

- ✓ First organic harvest if sown at **least 24 months after the begin of the conversion period**



For Perennial Crops

- ✓ First organic harvest **from 3 years** after the begin of the conversion period onwards



If the land has been contaminated with products or substances not authorized in organic production (including use of treated seeds!), conversion starts again

Reg. 2021/848 Annex II, Part I, 1.7

Begin of conversion & retroactive recognition

During the whole conversion period, all organic production rules must be met. The **CB** sets the official **begin of conversion** (normally with certification decision).

The conversion of a land parcel starts with notification to a CB and once all organic production rules are met.



Art 10: No previous period (before notification or application to CB) **may be retrospectively recognized as being part of the conversion period...**except if the operator can provide **proof** that the land parcels were natural or agricultural areas that, for a period of at least three years, have not been treated with unauthorised products.

CBs in Third Countries can (still) grant «retroactive recognition of a previous period as “part of the conversion period” but stricter conditions:

- **Operators must submit documentation** to prove that the land units were natural/not treated for past 3 years
 - maps of parcels, geolocation,
 - details of ongoing production
- **CB shall carry out risk analysis, risk-based sampling and provide inspection report** of the operator after physical inspection to verify consistency of information

See Reg. 2021/1698 Art.24 (Third countries outside EU)

Note: In the EU, retroactive recognition can only be granted by competent authority, no longer the CB!

Reg. 2021/848 Art 10 & Annex II, I.7 and Third Countries: Reg. 2021/1698:Art 10 & 24

Retro-active recognition in a GoO

The ICS has to have documented ICS procedures for registration of GoO members or adding new fields/activities for existing members. The procedure need to be approved by CB.

It is the ICS manager's responsibility to approve new members or units/activities of members



For retroactive recognition of conversion period of GoO members/member's land:

- ✓ Procedure for this shall be included in ICS procedures; Documents to submit & process for recognition to be clarified with the CB
- ✓ ICS will need to demonstrate investigation of previous practices & present details (e.g. size & geolocation, maps, photos, crop details) for each new member/land parcels to the CB
- ✓ The retroactive recognition can only be granted by the CB (*after risk-based verification during GoO inspection*):

Product status during conversion: Perennial crops

Begin of Conversion

Conversion Year 1

Products harvested in the first 12 months of conversion.

PRODUCT LABELLING

(No Reference to organic)

Conversion Year 2+3

Products harvested 12 – 36 months after the begin of the conversion
(food products of plant origin; single ingredient only)

IN-CONVERSION PRODUCT

After Year 3

Products harvested 36 months after the begin of conversion onwards can be labelled as **ORGANIC**

ORGANIC PRODUCT

Example:

- *Begin of conversion = Last application of prohibited inputs on the plot in August 2020*
- *Products harvested from August 2021 are “IN-CONVERSION”*
- *Crop harvested from August 2023 are ORGANIC!*

Reg. 2018/848, Art. 10

Product status during conversion: Annual crops

FOOD PRODUCTS FROM PLANT ORIGIN

PRODUCT LABELLING

Conversion Year 1 (0-12 months)

Products grown 0-12 months after Start of the Conversion period are non-organic

(No Reference to organic)

Conversion Year 2+

Products harvested AFTER 12 months of conversion UNTIL 24 months may be market as IN-CONVERSION (single ingredient products only)

IN-CONVERSION PRODUCT

After Conversion

First organic harvest: crops sown at least 24 months after begin of conversion

ORGANIC PRODUCT

Example:

- Last application of prohibited inputs was in August 2020
- Cotton sown in April 2021 and April 22: IN-CONVERSION product
- Cotton sown in April 2023 - harvested in Nov 2023 are ORGANIC!

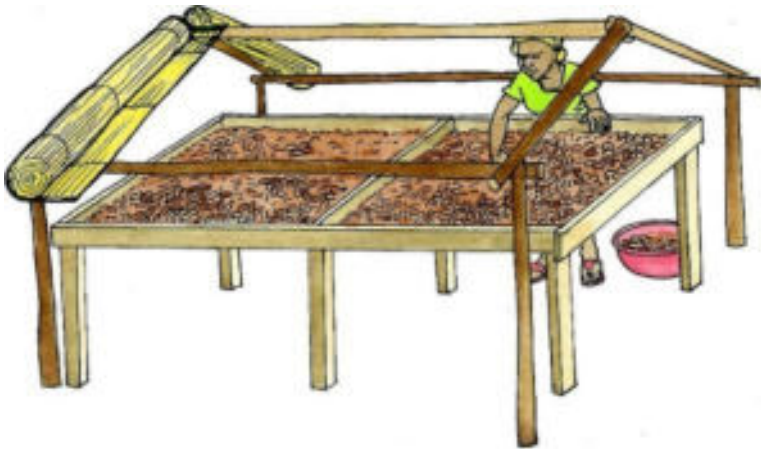
Reg. 2018/848, Art. 10

2.3. Requirements for Preparation, Processing & Traceability of Organic Products in a GoO



Key rules preparation/processing by members

Key production rules for preparation/processing by GoO Members, which must be carefully checked by the ICS and crosschecked by the external CB during member re-inspections:



Precautionary measures to prevent commingling and contamination of the certified product at all stages (Art 9.6):

- during post-harvest activities by the member (e.g. drying, de-hulling etc)
- during on-farm storage (in clean containers, no contamination by e.g. pest control in the farmers house, separate storage area is farmer stores also non-organic crops)
- during member's transport to the purchase centre



Note: the required separation measures if member's is be handling of the same crop in organic/conversion quality are tricky to manage in a GoO – possible with ICS supervision of member's harvest & handling activities.

Only authorized substances may be used at any time for pest control in any area where organic products are stored or handled.

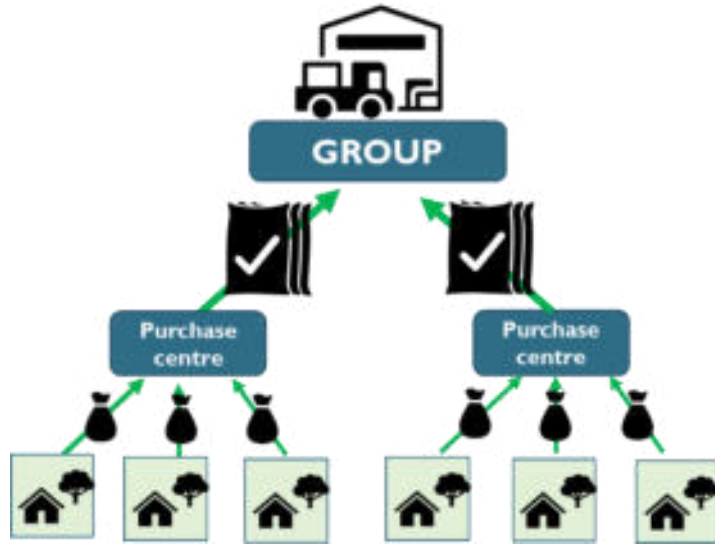
Only specified products will be allowed for cleaning & disinfection in on-farm production, processing and storage

(will be included in Reg. 2021/1165)

Reg. 2018/848 Art. 9;6

From 2024: Reg. 2021/1165 Authorised Substances, Annex IV

Traceability & product flow control in a GoO



Art 36.1 (g): ICS shall comprise documented procedures on ... the internal traceability, which

- show the origin of the products in the joint marketing system and
- allow the tracing of all products of all members throughout all stages, such as production, processing, preparation or export
- include estimation and cross-checking the yields of each member

Note: the new requirements extend the ICS responsibility beyond the delivery to purchase centres – ICS responsible for traceability until sales by the GoO legal entity!

- At purchase, **member deliveries must be added up to cross-check** with yield estimates
- **A consistent lot identification system** from point of purchase through preparation & storage up to final sales to another unit is very important.
Note: In case of Major NCs, the measures will be much more severe if affected lots cannot be located as separate from rest of production!



Traceability Records (Reg 2021/279, Art 5g)

- ✓ **Joint purchase & distribution of farm inputs** (incl. seeds or planting material to members)
- ✓ **Records on delivery of products from each member** to the joint marketing system. *List of producers & quantities contributing to each lot must be recorded for traceability*
- ✓ **GoO production, storing (in & out) & preparation records**
- ✓ **Sales of products by the GoO**

Purchase / collection from members into the joint marketing system



If farmers deliver the products to a **GoO** purchase centre :

- ✓ **Receipt to farmer & purchase record**
- ✓ **Documented Reception check:** confirm organic status & yield estimate



If farm gate collection system by the GoO: Detailed measures to be taken by collection driver :Annex III. I

Precautionary Measures & Traceability at the purchase centre (checked in ICS inspection)

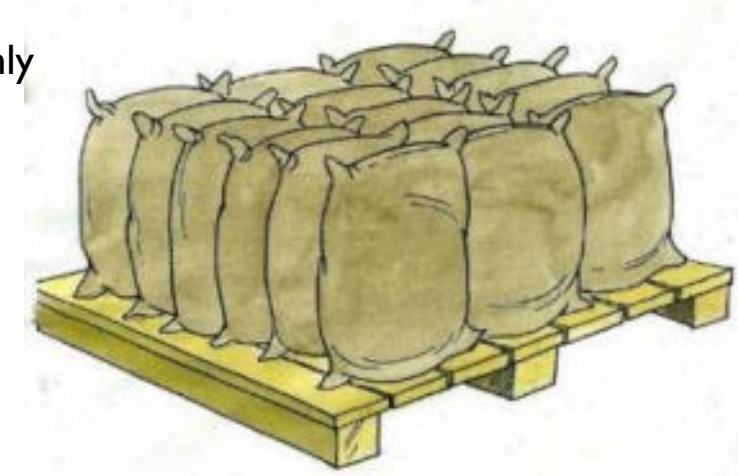
- ✓ **Purchase staff needs to be trained in organic production rules**
- ✓ **Purchase procedures to effectively ensure correct check & reception from members, immediate product identification as “organic” and to prevent accidental mixing with non-organic (or conversion) products at all times**
- ✓ **Detailed purchase & traceability records** (consistent lot number system)
- ✓ **Organic Products to be kept separated & labelled as “organic” in designated organic areas that are not treated with unauthorized substances at ANY time during the year**

Each Purchase Centre must be annually inspected by ICS

General principles product handling in the GoO

General principles for transport, storage & preparation (including “processing”) of organic products at all times → See details in Annex III

- **Precautionary measures to prevent contamination:** clean packaging or storage areas, only authorized substances used at any time for areas where organic products are handled)
- **Specific rules for storage:**
 - ✓ Clear identification of organic products at any time
 - ✓ detailed measures in case of storing multiple qualities or other agricultural products. (→ Annex III, 7.1 & 7.4)
- ✓ **Detailed traceability records** (incl. storing, preparation/processing and sales records) **required with consistent lot number system** to trace lots back to GoO members.



“Processing” = any action that substantially alters the initial product, e.g. heating, curing, extracting, marinating, drying

If GoO performs “processing” of members’ products → Detailed Processing rules in Annex II/ Part IV apply and controlled according to CBs processing control procedures and requirements.

**Reg. 2018/848: Art. 9.6, Art. 28, Annex III;
Rules for Production of Processed food: Annex II, Part IV**

Imprint

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