

Information for labelling of products from organic production

General

Products related to organic production include organic products, in-conversion products, <95% products and products from hunting or fishing with ingredients from organic production.

The labelling of a product with reference to organic production is legally defined by Regulation (EU) 2018/848, current version. A product that does not fully comply with the requirements of the regulation must not contain any labelling related to organic production.

For the purposes of this Regulation, a product shall be regarded as bearing terms referring to organic production where, in the labelling, advertising material or commercial documents, such a product, its ingredients or feed materials used for its production are described in terms suggesting to the purchaser that the product, ingredients or feed materials have been produced in accordance with this Regulation.

The term „labelling“ is defined in the EU Organic Regulation¹ as:

„labelling“ means any words, particulars, trade marks, brand name, pictorial matter or symbol relating to a product that is placed on any packaging, document, notice, label, ring or collar that accompanies or refers to that product.

Declaration of the code number of the responsible control body

The product labelling (e.g. on labels of products from organic production) must always bear the „code number of the responsible control body“² to which the operator that carried out the last production or preparation operation is subject.

Product accompanying documents (e.g. invoices, delivery notes) of products from organic production must always bear the code number of the control body that certifies your farm/company.

- For processing and trading companies, the code number of the Bio Garantie GmbH is:
AT-BIO-301
- For farms, the code number of the Bio Garantie – Landwirtschaft GmbH is:
AT-BIO-302

Here there can be differences in the responsibility of control bodies, whose code number must be stated on the labelling of the products themselves and on the documents accompanying the goods.

This difference must be observed, for example, for certified traders who do not carry out any production or processing processes themselves, or whenever the subcontractor has finished labeling the product.

Labelling of organic foods³ (incl. processed feed⁴ and other organic products)

In organic food 100% of the agricultural ingredients are usually organic. If necessary, conventional ingredients can be used up to 5% (by weight). However, only if the rules on restricted use of non-organic agricultural ingredients (see positiv lists⁵) set in the "Organic Regulation" are met.

The **commercial product designation** should be accompanied by the term organic (and their derivatives and diminutives, such as 'bio' and 'eco'). For better understanding, the written reference to organic production could be added.

e.g.: **organic** apple/carrot juice

or: apple/carrot juice **from organic production**

Labelling on the accompanying documents

Invoices, delivery notes, etc. must contain a product-related organic reference and the code number of the control body that certifies your farm/company.

Labels of organic products

EU organic logo and obligatory declaration

In the case of “prepackaged food”⁶ that fall under the category “organic foods”³, the EU organic logo and the indication of “provenance/origin”⁷ together with the “code number of the responsible control body”² shall also appear in the packaging. The indication of provenance/origin and the code number of the responsible control body does not have to appear directly next to the EU organic logo, but are mandatory in the same visual field of the EU organic logo.

The indication of the “provenance/origin”⁷ must correspond to the actual origin of ingredients. Small quantities by weight of ingredients may be disregarded, provided that the total quantity of the disregarded ingredients does not exceed 5 % of the total quantity by weight of agricultural raw materials.

e.g.:



AT-BIO-301 or AT-BIO-302

EU-agriculture or non-EU-agriculture or EU-/non-EU-agriculture

If the EU organic logo is used voluntarily to claim organic products, e.g. on unpackaged products, then the indication of “provenance/origin”⁷ together with the “code number of the responsible control body”⁴ shall also appear in the labelling (see obligatory declaration above).

The “code number of the responsible control body”² must always be indicated on the labels of products with reference to organic production.

Details on the terms of use of the EU organic logo and the trademarks of the Bio-Garantie Group can be found on our website <https://www.bio-garantie.at/en/dokumente>.

Labelling of in-conversion products⁸ (products produced during the conversion period⁸)

In the case of in-conversion products⁸, the reference in-conversion product or product from conversion to organic production should be added to the commercial product designation.

e.g.: wheat, in-conversion product

or apple juice, in conversion product

Labelling on the accompanying documents

Invoices, delivery notes, etc. must contain a product-related „in-conversion product“ reference and the code number of the control body that certifies your farm/company.

Labels of in-conversion products⁸

Requirement:

- Product manufactured during the conversion period⁸.
- Only applicable to mono-products (products containing only one agricultural ingredient).
- The term “in-conversion product” only exists in the processing area for vegetable raw materials. There are no animal “conversion products”.
- Additives and processing aids must correspond to the relevant positive list⁹.

Labelling:

- These products MAY NOT be labeled as “organic”.
- They may be labelled as “in-conversion products” or “products from conversion to organic production”.
- The label must bear the “code number of the responsible control body”².
- The EU organic logo MAY NOT be used.
- The trademark of the Bio Garantie GmbH MAY NOT be used.

Labelling of <95% products¹⁰

The <95% products¹⁰ may only be labelled as „product with XX% organic ingredients“ or at least as „product with <95% organic ingredients. Whereby the stated „XX“-percentage must correspond to the specifications.

e.g.: **Compound with XX% organic ingredients**

Labelling on the accompanying documents

Invoices, delivery notes, etc. must contain a product-related reference „with XX% organic ingredients“ or „with <95% organic ingredients“ reference and the code number of the control body that certifies your farm/company. The quoted „XX“-percentage must correspond to the specifications.

Labels of <95% products¹⁰

Requirement:

- More than 5% by weight of the agricultural ingredients in the product are non-organic (conventional).
- Additives and processing aids must correspond to the relevant positive list⁵.

Labelling:

- These products must not have an organic reference in the sales description (with the product name).
- The list of ingredients shall indicate which ingredients are organic. This information must be indicated in the same font and size as the ingredients.
- The total percentage of organic ingredients in proportion to the total quantity of agricultural ingredients shall be included in the list of ingredients.
- The label must bear the “code number of the responsible control body“².
- The EU organic logo MAY NOT be used.
- The trademark of the Bio Garantie GmbH MAY NOT be used.

Labelling of products from hunting or fishing with ingredients from organic production¹¹

This applies to products whose conventional main ingredient is a product of hunting or fishing and which otherwise only contain organic ingredients and in the production of which only the products, substances, food processing additives and processing aids permitted for the organic production of food are used.

These products may include an organic claim in the sales description (next to the product name), provided that the organic claim in the sales description is clearly linked to another ingredient that is organic and different from the main ingredient.

e.g.: **tuna in organic sunflower oil** or **deer sausage with organic pork bacon**

Labelling on the accompanying documents

On invoices, delivery notes, etc., these products should be clearly identified/labelled as products from hunting or fishing.

Regarding the possibility of including an organic claim in the sales description, see above.

The documents accompanying the goods must bear the code number of the control body that certifies your farm/company.

Labels of products from hunting or fishing with ingredients from organic production¹¹

Requirement:

- Products whose main ingredient is a product of hunting or fishing and
- otherwise contain only organic agricultural ingredients and
- Additives and processing aids must correspond to the relevant positive list⁹.

Labelling:

- Regarding the possibility of including an organic claim in the sales description, see above.
- The list of ingredients shall indicate which ingredients are organic. This information must be indicated in the same font and size as the ingredients.

- The total percentage of organic ingredients in proportion to the total quantity of agricultural ingredients shall be included in the list of ingredients.
- The label must bear the “code number of the responsible control body”².
- The EU organic logo MAY NOT be used.
- The trademark of the Bio Garantie GmbH MAY NOT be used.

When specifying a list of ingredients, it shall ALWAYS be indicated which ingredients are organic

This identification could be given with the organic reference (as an abbreviation) or with the written reference to the organic production method linked via a footnote - often indicated by an asterisk *) – for example:

Ingredients: water, wheat flour*, raising agent*(corn starch*, raising agent: sodium carbonate, acidifier: potassium tartrate), herbs*, salt.

*...from organic production

¹according to Regulation (EU) 2018/848 current version, Chapter I, Article 3, (52)

²the code number of the control authority or control body to which the operator that carried out the last production or preparation operation is subject

³according to Regulation (EU) 2018/848 current version, Chapter IV, Article 30, (5), a)

⁴according to Regulation (EU) 2018/848 current version, Chapter IV, Article 30, (6)

⁴the code number of the control authority or control body to which the operator that carried out the last production or preparation operation is subject

⁵according to Annex V of Regulation (EU) 2021/1165, current version (marked with an asterisk (*) in the "Code" column) or according to the "positive list^{5A}" or for which a member state has granted a provisionally authorization for the use of non-organic agricultural ingredients

^{5A}until 13.12.2021 in Annex IX of Regulation (EC) 889/2008 current version or from 01.01.2024 in Annex V Part B of Regulation (EU) 2021/1165, current version

⁶each sales unit that is to be sold as such to the end consumer and to providers of mass catering (within the meaning of Article 2 paragraph 2 letter e of Regulation (EU) No. 1169/2011 as amended)

⁷the place where the agricultural raw materials of which the product is composed have been farmed

⁸according to Regulation (EU) 2018/848, current version, Article 10

⁹according to Regulation (EU) 2021/1165, current version, Annex V

¹⁰according to Regulation (EU) 2018/848, current version, Chapter IV, Article 30, (5), b)

¹¹according to Regulation (EU) 2018/848, current version, Chapter IV, Article 30, (5), c)