

COM/2025/780 Proposal for a Regulation amending Regulation (EU) 2018/848 as regards certain production, labelling and certification rules and certain rules on trade with third countries.

1. DAERA's assessment of impact states that the proposed changes would affect NI businesses involved in organic production, certification, labelling, import processes and livestock standards operations. How many businesses in NI operate within that sector?

- A total of 192 organic producers and processors operate in Northern Ireland.

2. What – if any – additional costs and/or administrative burdens would those businesses face as a result of the proposed EU act applying in Northern Ireland?

- NI processors using imported organic ingredients above the 5% threshold would have to check and document that these imported ingredients meet the new Annex VII rules (e.g., EU-style soil management, animal welfare, low artificial input processing). Products that do not meet Annex VII must not use the EU organic logo.
- The amendment removes a major administrative requirement for the EU Commission: The amendment removes the requirement for the Commission to publish lists of permitted substances. Therefore, easing the burden for both the EU Commission and operators as they are no longer restricted to using Commission-authorized cleaning/disinfection products; they may use products already on the market.
- Broadly speaking, the amendment streamlines/loosens pre-existing regulatory thresholds, and does not have major administrative implications for businesses beyond taking note of the more generous provisions.

3. What engagement has taken place between DAERA / UKG and businesses within the sector in relation to any potential impacts arising from the proposed EU act?

- Defra are the NI Competent Authority for the implementation of Organic Production rules and standards for Northern Ireland. They have engaged with the sector relating to this amendment as follows:
 - On 18th December 2025, the NI Competent Authority cascaded update to NI stakeholders on the proposed amendments to Regulation (EU) 2018/848, with the following link:

[Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation \(EU\) 2018/848 as regards certain production, labelling and certification rules and certain rules on trade with third countries](#)

- On 21st October 2025, the NI Competent Authority notified stakeholders of a Call for Evidence on proposed amendments to Regulation (EU) 2018/848. This process allows stakeholders to provide direct feedback on draft regulations to the Commission. The Commission adopted act is open for stakeholder feedback from 23rd January 2026 until 20th March 2026 and can be viewed here: [Organic production – targeted updates and simplification](#).
 - Beyond certified control bodies (CBs), no additional targeted business engagement has occurred since publication; historically, DEFRA relies on CBs' established operator networks to cascade regulatory updates.
4. **DAERA's assessment of impact states that the proposed EU act will not affect organic products sold in NI which have moved from GB through the Northern Ireland Retail Movement Scheme (NIRMS). How many consignments of relevant organic products move from GB to NI using the NIRMS? How many move to NI outside of the NIRMS?**
- Data relating to the volume of organic consignments on the basis of this category distinction is not recorded for goods moving through the Northern Ireland Retail Movement Scheme (NIRMS).
5. **What impact – if any - would the proposed EU act have on consignments of relevant organic products moving from GB to NI outside of the NIRMS?**
- The proposed act introduces no new barriers, no new documentation requirements, and no new compliance obligations for GB to NI organic consignments outside NIRMS.
 - It in fact future proofs the movement of goods that fall outside NIRMS by extending the existing equivalence regime from 2026 to 2036.
6. **DAERA's assessment of impact states that the proposed EU act not applying in NI could introduce *“avoidable frictions for NI organic operators engaged in EU-facing trade, but these would not be felt at community level.”* How would those potential frictions impact businesses in NI? Why does DAERA consider that those frictions would not be felt at community level?**
- Taken as a whole, outside of the organics industry, the proposed amendments do not introduce new obligations on consumers, public services, or community-level actors in NI.

- If not adopted, avoidable frictions for NI Organic operators engaged with EU Trade:
 - Use of EU Organic Logo requirements would not be adopted in NI
 - The EU Commission would not be updating the list of recognised substances for use in cleaning and disinfection – they would not be able to solely use products readily available on the market.
 - Amendments relating to the livestock production rules would not apply to NI Operators
- Failure to abide by the terms of the amendment (should it be implemented) would be significant less so due to any individual provision within it (which are primarily designed to streamline or extend existing regulation), and more so for the knock-on effect on the broader EU-UK reset process.
- Divergence could introduce avoidable complexity within ongoing UK–EU SPS and organics-related discussions that would risk forcing a temporary reintroduction of safeguard measures akin to those applied by the EU toward non-equivalent regimes. These may include, but are not limited to:
 - Dual-labelling complications,
 - Loss of access to the EU logo,
 - Repeat certification steps,
 - Marketability disadvantages.

7. In DAERA's view, what are the main benefits of applying the proposed EU act in NI?

- The headline proposal of the regulation is the extension of the recognition of equivalent third countries' organics regimes from 2026 to 2036. This will avoid disruption in organic trade flows and maintain continuity for operators while further agreements are being concluded.
- The proposal supports smaller operators by removing annual turnover limits and increasing the upper threshold on annual sales volume for these small operators to 10,000kg per year. It also increases the maximum eligible surface areas of members' holdings in order to address difficulties preventing smaller operators from becoming part of groups of operators.
- The proposal amends withdrawal periods for veterinary medicines by removing the requirement for a minimum 48-hour withdrawal period, so that the period will be twice the withdrawal period as stated in the product information for the medicine being used. This eradicates circumstances where a 48-hour withdrawal period is enforced despite the applicable normal withdrawal period of the medicinal product being zero days.

- The amendments modernise poultry husbandry rules by allowing outdoor access only once birds are sufficiently feathered, improving welfare protections for younger birds.
- Overall, the amendment streamlines regulation and extends safeguards that would benefit NI operators, retailers, and relevant livestock.