

PROPOSED AMENDING EU ACT INITIAL ASSESSMENT OF IMPACT

Date: 04/02/2026

DSC REF: DSC/01a/2026

Department: DAERA

Proposed Amending EU Act

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

[EUR-Lex - 52025PC0780 - EN - EUR-Lex](#)

Amending:

REGULATION (EU) 2018/848 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007

[EUR-Lex - 02018R0848-20250325 - EN - EUR-Lex](#)

Summary of the Act

This proposed regulation amends existing provisions of Regulation (EU) 2018/848 (Protocol Annex 2, Heading 33 on Food – other), without altering their essence, to facilitate organic production, labelling, controls and trade across Member States and in third countries.

The proposed amendment principally extends the current equivalence arrangements with third countries, while simplifying and streamlining other minor aspects of Regulation (EU) 2018/848, such as certification rules, veterinary medicine withdrawal periods, and operator group size limits.

The proposal centres around the importance of fair competition between EU organic products and those imported from countries with a recognised equivalent organic system, outlining the need to reduce administrative burdens, improve clarity for consumers and operators and prevent trade disruptions. Furthermore, it retains the EU's line on safeguarding the functioning of the Single Market with regard to organic products and maintains the integrity and consumer trust in the EU organic logo. The EU estimates that changes as a result of the proposal would entail savings at EU level of upwards of EUR 47.8 million.

Key amendments to Regulation (EU) 2018/848 include, in descending order of significance for NI and its organics sector:

- Article 33 and Article 48: Extending recognition of equivalent third countries from 2026 to 2036.
- Article 30 and Article 33: products imported from third countries whose organic systems are recognised as 'equivalent' to EU rules may use their own national organic logo and equivalent terms.
- Article 30(2): Strengthened to prohibit use of any terms listed in Annex IV unless the product fully complies with Regulation (EU) 2018/848.
- Article 14 & Annexes: Introducing more practical and welfare-oriented livestock rules.
- Article 14 & Annexes: Amending withdrawal periods for veterinary medicines as defined in Regulation (EU) 2019/6 (twice the withdrawal period referred to in pre-existing product information).
- Article 24 & Annexes: Simplifying rules by removing the need for Commission-authorised cleaning/disinfection product lists.
- Article 36: Relaxing constraints on the composition and size limits of groups of operators.
- Article 35: Adapting the conditions for the exemption of smaller operators selling unpacked organic products other than feed from the obligation of being in possession of a certificate pursuant to Article 35(1) of Regulation (EU) 2018/848.

This proposal is currently open for feedback for eight weeks prior to formal adoption. The feedback period will close on 20 March 2026.

Department(s) Responsible

Although organic production and labelling are devolved matters, the Department of Environment, Food and Rural Affairs (Defra) is the Competent Authority for implementing Organic Policy across the UK, including Northern Ireland.

Initial Assessment of Impact

The proposed changes would primarily affect Northern Ireland (NI) businesses involved in organic production, certification, labelling, import processes and livestock standards operations. However, the proposal does not introduce new obligations on consumers, public services, or the wider NI population, and it will not affect organic products sold in NI which have moved from GB through the Northern Ireland Retail Movement Scheme. In fact, the most substantive amendment, the extension of recognition for equivalent third country organic control systems to 2036, is intended to avoid disruption in organic trade flows and maintain continuity for operators. The proposal is therefore unlikely to harm the

sector in Northern Ireland, with the only de-facto challenge being to enforce compliance in a timely manner. As such, it does not appear likely that the application of the proposed amending EU act would have a significant impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist.

It should nevertheless be noted that non-application could introduce avoidable frictions for NI organic operators engaged in EU-facing trade, but these would not be felt at community level.

UK Government Explanatory Memorandum

Due to the timeline of this commission, the UK Government Explanatory Memorandum is still being finalised.

Analysis by the European Commission on its Impact Assessment

No impact assessment was conducted for this proposal. However, further statements related to the likely impact, as well as a relevant Staff Working Document, are included at Annex A.

Departmental Engagement

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](#)

DAERA officials work closely with Defra to represent the organic sector in NI, raise industry concerns and highlight potential divergence in organic standards between NI and GB.

Annex A

European Commission Impact Assessment

The proposal states that no impact assessment was conducted in light of the need to urgently:

- (i) *“ensure that consumers are able to make informed choices when purchasing products from third countries whose organic production and control systems have been recognised as equivalent to those of the Union, as well as to ensure consumer confidence in those products and in the organic production logo of the European Union whilst ensuring fair competition within the internal market between products that fully comply with Union production and control rules and those that comply with rules equivalent to those Union rules;*
- (ii) *(ii) avoid any disruption of trade in organic products with third countries recognised as equivalent;*
- (iii) *(iii) address, in a targeted way, the challenges that the organic sector is facing, removing burdens and enhancing its competitiveness, no impact assessment could be conducted.”*

However, the proposed amendments to Regulation (EU) 2018/848 have been developed on the basis of evidence gathered through consultations described in the section “Stakeholder Consultations” of the proposal ([EUR-Lex - 52025PC0780 - EN - EUR-Lex](#)). In relation to Regulation (EU) 2018/848, it is noted further in the proposal that *“the proposed amendments are targeted and will not alter the overall objectives of the policy”*.

The proposal also notes that the full impact *“will depend on the adherence to the proposed measures by organic operators. Beyond reduction of monetary costs, removing barriers for operators in the Union and in third countries is expected to stimulate the maintenance and the uptake of organic farming, thus enhancing its environmental and social benefits”*.

Furthermore, the proposal states: *“The Commission will present the reduction of burden, including an assessment of costs and benefits and how the inputs from the consultations have been taken into account, in an analytical Staff Working Document to be published along with this proposal.”*

The Staff Working Document noted above can be found at: [EUR-Lex - 52025SC0424 - EN - EUR-Lex](#)

The proposed measures are not expected to result in an increase in greenhouse gas emissions. Further statements relating to the limited climate impact are included in the proposal ([EUR-Lex - 52025PC0780 - EN - EUR-Lex](#)).