

Sections 1.04 and 6.03 are amended in accordance with the requirements of Commission Regulation (EU) No 271/2010 amending Regulation (EC) No 889/2008 laying down detailed rules for the implementation of Council Regulation (EC) No 834/2007, as regards the organic production logo of the European Union – effective from 01.07.2010.

Amendment Number

A50

1.04 and
6.03

The rules relating to use of the new EU logo and the new control codes issued to each OCB are set out in detail in the separate document on this matter issued to all operators (attached).

Organic Labelling – Regulatory Changes effective from 01.07.2010



Implementation of Commission Regulation (EU) 271/2010 laying down detailed rules for the implementation of Council Regulation (EC) No 834/2007, as regards the organic production logo of the European Union

The rules on labelling for organic food are set out in Articles 23 to 25 of EC 834/2007, Articles 57 and 58 of EC 889/2008 and Article 1 to 2 of EU 271/2010.

With effect from July 1st 2010, the new EU 'Euro-Leaf' logo for organic products will be introduced throughout the European Union. The use of the organic logo of the EU will be mandatory for all **pre-packaged** organic products that have been produced in any EU Member State. The organic logo of the EU can be used on a **voluntary basis** on **non-pre-packaged** products that originate from the EU, or on any organic products that are **imported from third countries***.

The EU Commission have just published the rules pertaining to the labelling of organic produce and products which come into effect on 01.07.2010. However, the new organic labelling regulations provide for a **two year transition period** to facilitate the introduction of the new organic logo of the EU onto packaging – please refer to the last paragraph **Transitional Arrangements** for the details. Notwithstanding these provisions, the new labelling regulations can be implemented immediately provided the requirements specified below are adhered to.

LABELLING REQUIREMENTS

All labels must contain the following elements which **MUST** be placed in **the same visual field** as the organic logo of the EU, i.e. in the **same visual field** means that the control code and origin of product can be placed either above, below, or at either side of the organic logo of the EU:

- 1) **Logos:** The Organic Trust and EU Logo – the Organic Trust logo uses Pantone 349 and the EU Logo uses Pantone Light Green 376 (*see below for exact technical requirements*)
- 2) **The words:** **Certified Organic**
- 3) **The code:** **IE-ORG-03** (Republic of Ireland operators)
or **GB-ORG-09** (Northern Ireland operators)
- 4) **Place of Origin:** See below for requirements
- 5) **The Licence No:** **xxx** if applicable, i.e. **only mandatory** in cases where the operator's name and/or address **do not** appear on packaging, e.g. supermarket own-brand organic products)

CLARIFICATION RE PLACE OF ORIGIN REQUIREMENTS:

Place of origin for product ingredients must be clearly stated on the label – this must be placed **immediately below** the control body code number (see specific examples on **Page 4 of this document**):

- Where ingredients of agricultural origin originate from within the EU they must be labelled as **'EU Agriculture'**
- Where ingredients of agricultural origin originate from outside the EU they must be labelled as **'Non-EU Agriculture'**
- Where ingredients of agricultural origin originate from both inside and outside the EU the product must be labelled as **'EU/Non-EU Agriculture'**

The indication 'EU' or 'Non-EU' may be replaced or supplemented **by the name of a country** in the case where all agricultural raw materials of which the product is composed have been farmed in that country.

For the 'EU' or 'Non-EU' or country of origin indication, small quantities by weight of ingredients **may be disregarded** provided that the total quantity of the disregarded ingredients **does not exceed two per cent (2%)** of the total quantity by weight of raw materials of agricultural origin.

CONDITIONS FOR USE OF NEW EU LOGO

The organic logo of the EU shall comply with the model shown below and can be downloaded from: http://ec.europa.eu/agriculture/organic/eu-policy/logo_en Alternatively the Organic Trust have had our graphic designers formulate the new EU logo and the OTL logo in various print-ready formats which are available from the Organic Trust office.

The EU have also published a **'Frequently asked questions'** document which is downloadable from: http://ec.europa.eu/agriculture/organic/files/eu-policy/logo/FAQ_logo_en.pdf



EU Logo Pantone Light Green 376, CMYK: 50 / 0 / 100 / 0 and RGB: 169 / 201 / 56 (i.e. 50% Cyan + 100% Yellow when a four colour process is used)

The organic logo of the EU can also be used in black and white, **only where it is not practicable to apply it in colour.**

If the background colour of the packaging or label is dark, the symbols may be used in negative format, using the background colour of the packaging or label.

If a symbol is used in colour on a coloured background, which makes it difficult to see, a delimiting outer line around the symbol can be used to improve contrast with the background colours.

In certain specific situations where there are indications in a single colour on the packaging, the organic logo of the EU may be used in the same colour.

The organic logo of the EU may be associated with graphical or textual elements referring to organic farming, under the condition that they do not modify or change the nature of the organic logo of the EU, nor any of the conditions mentioned in Article 58 of 889/2008. When associated to national or private logos using a green colour different from the reference colour mentioned above, the organic logo of the EU may be used in the same non-reference colour (*Organic Trust operators who wish to use the new EU logo in the same pantone green as the OTL logo can apply to the Organic Trust for the specific .jpeg or .pdf file which accommodates this provision*).

The EU logo must have a height of at least 9mm and a width of at least 13.5mm; **the proportion ratio/height/width shall always be 1:1.5**. Exceptionally, the minimum size may be reduced to a height of 6mm for very small packages. The logo, the control body code and the origin (see examples on page 4) to be placed together in the order specified **anywhere** on the pack **provided** that they are in a conspicuous place that is easily visible, clearly legible and indelible.

The organic logo of the EU shall only be used if the product concerned is produced in accordance with the requirements of Regulation (EEC) No 2092/91 and its implementing regulations or Regulation (EC) No 834/2007 and the requirements of the (EU) Regulation No 271/2010. In this regard, a product must contain at least 95 % organic ingredients to use the organic logo of the EU. The organic logo of the EU cannot be used if less than 95% of the content of agricultural ingredients of a product have been produced organically.

PRODUCTS IMPORTED FROM NON-EU COUNTRIES ON THE BASIS OF A VALID AND UP TO DATE THIRD COUNTRY IMPORT LICENCE

The use of the new EU logo is **optional** for products imported from non-EU or third countries. However, it is important to state that if an importer wishes to have the EU logo applied to products imported from non-EU countries, **for the present** the Organic Trust Ltd must firstly obtain direct guidance from the Competent Authority (i.e. the Organic Unit of DAFF) for use of the EU logo on the particular non-EU products involved.

In addition, changes are due to take place in relation to the control codes to be used on **products imported from third countries** – clarification on the changes required is expected to be available from the Commission before the end of May 2010.

Therefore, operators who import organic products from third countries on foot of valid third country import licences must contact the Organic Trust Ltd in the first instance to ascertain the exact labelling requirements. The requirements will then be specified to each Third Country Importer on a specific case-by-case basis – in no circumstances should the EU logo or the control code of the Organic Trust Ltd or the control code/or name of the third country certifier be applied to labels in the absence of specific prior approval from the Organic Trust Ltd as confirmed with the Competent Authority (i.e. Organic Unit of the Department of Agriculture, Fisheries & Food).

AQUACULTURE PRODUCTS

The EU logo can only be used on aquaculture products which are deemed to fully conform with the requirements of (EC) Regulation 710/2009, i.e. the EU logo cannot be used on organic products produced to private or national standards. In this regard, the Organic Trust Ltd must be provided with the names of the suppliers of all aquaculture products and the list of suppliers

must be accompanied by a copy of the relevant organic licences. The Organic Trust Ltd must then obtain confirmation from the organic certification bodies involved with the certification of the particular aquaculture products that the products were produced in full conformity with (EC) Regulation 710/2009.

EXAMPLES OF LABELLING



Certified Organic
IE-ORG-03
EU Agriculture
*Above example where all
ingredients* produced within
the EU*



Certified Organic
IE-ORG-03
Non-EU Agriculture
*Above example where all
ingredients* produced outside
of EU*



Certified Organic
IE-ORG-03
EU/Non-EU Agriculture
*Above example where
ingredients* were produced
both within and outside
the EU*



Certified Organic
IE-ORG-03
Ireland
*Above example where all
ingredients* were produced in
Ireland*

**i.e. ingredients of agricultural origin*

* USE OF OTL/EU LOGO ON IMPORTS FROM NON-EU COUNTRIES



Exact clarification on the requirements for use of the EU logo on products imported from Third Countries has been sought from the EU – Third Country Importers should contact the Organic Trust Ltd in the first instance **BEFORE** applying the EU logo or any control code/certifier name to such products.

USE OF THE OTL/EU LOGO IN BLACK AND WHITE



The organic logo of the EU and the OTL logo can also be used in black and white in situations **where it is not practicable** to apply them in colour.

EXCLUSIONS

The new EU logo **cannot be used** on products which lie outside the legislative scope of the EU organic regulations including:

- products of hunting and fishing of wild animals, cosmetics and textiles;
- products containing less than 95% organic ingredients
- products which are in-conversion to organic
- products for which only national or private standards apply

PRIOR APPROVAL FOR ALL LABELS

All labelling and packaging materials must be approved by the Organic Trust Ltd prior to printing. In addition, **specific approval** for the use of the EU logo on both **aquaculture** products and on products from non-EU countries (**i.e. Third Country Imports**) must be obtained from the Organic Trust Ltd prior to printing.

TRANSITIONAL ARRANGEMENTS

Stocks of products produced, packaged and labelled before July 1st 2010 in accordance with the organic regulations may continue to be brought onto the market until stocks are exhausted.

Packaging material compliant with the organic legislation as in force before the introduction of the new EU logo may continue to be used, and possibly renewed, until **July 1st 2012**.

Notwithstanding the above, it is recommended that the new requirements are implemented by all operators in a timely manner whilst simultaneously avoiding any unnecessary waste – thank you.

If any operator wishes to seek clarification on any aspect of the new labelling requirements, please contact Helen Scully at 01 853 0271.

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