

Information sheet II

Generally required identification elements when labelling organic products ordered by third parties

This regulation is proposed for those labelling operations where the labelling is commissioned by third parties.

Example: A retail chain (or trader) subcontracts the labelling with the trade mark and/or the name of the retail chain or trader on the labels to a processing plant. The retail chain is inspected by inspection body X or isn't inspected at all. The processor is inspected by inspection body Y. The processor carries out the actual physical final processing steps and should remain anonymous on the labels.

The retail chain (or retailer) who placed an order is not considered as the operator that carried out the last production or preparation operation. Now the question is, of which "code number of the responsible control body"¹ must be visible on the labels.

The general requirements remain unchanged:

- In the case of "organic foods"² 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 can be added.

e.g.: **organic-apple-juice**

or: **apple-juice from organic production**

- In the list of ingredients (if general required) must indicate which ingredients are organic. This identification can be given with the organic reference (as an abbreviation) and/or with the written reference to the organic production method, e.g. usual identification marked with an asterisk (*):

***ingredients from organic production: apple juice*, carrot juice*, acidifier: citric**

or: ***organic ingredients: apple juice*, carrot juice*, acidifier: citric**

Code number of the control body – please note:

In addition to the organic information, the "code number of the responsible control body"¹ shall also appear in the labelling.

It should be noted here that the "code number of the competent control body"¹ in this case is that of the processor mentioned above (control body Y).

¹the code number of the control authority or control body to which the operator that carried out the last production or preparation operation is subject


²according to Regulation (EU) 2018/848, current version, Chapter IV, Article 30, (5), a)

Obligatory declaration:

In the case of “**prepackaged food**”³ that fall under the category “organic foods”², the EU organic logo and the indication of “**provenance/origin**”⁴ together with the “**code number of the responsible control body**”¹ shall also appear in the labelling. The indication of “provenance/origin”⁴ and the “code number of the responsible control body”¹ 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.

Further code numbers of control bodies of distributors or trading companies may be indicated if this indication is not misleading for the consumer. This can be done, for example, by entering the code number immediately after the trader’s address. Or an explanatory text can be added like “Trader is inspected by AT-BIO-301”.

Detailed example: Label for pumpkin seeds – the company commissioning the labelling is inspected by AT-BIO-301 (Austria Bio Garantie GmbH), the processor is inspected by AT-BIO-902 (SGS Austria Controll).

 AT-BIO-902 Non-EU Agriculture	Organic Pumpkin Seeds <i>from organic production</i>	Produced for: Trading company ABC Sample Street 123 1234 Sample City inspected by AT-BIO-301
Net quantity: 5 kg		
Trader inspected by: AT-BIO-301		Best before: 18/09/2021

For all other labels of “organic foods”² (e.g. for labels of organic products for further processing like big bags, ...) the EU organic logo does not have to be used. In addition to the organic information, the label must also state the “code number of the responsible control body”¹.

If the EU organic logo is used voluntarily to claim “organic foods”², then the indication of “provenance/origin”⁴ together with the “code number of the responsible control body”¹ shall also appear in the labelling (see obligatory declaration above).

For the indication of the “provenance/origin”⁴ 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.

The EU organic logo shall have a height of at least 9 mm and a width of at least 13,5 mm; the proportion ratio height/width shall always be 1:1,5. Exceptionally, the minimum size may be reduced to a height of 6 mm for very small packages.

¹the code number of the control authority or control body to which the operator that carried out the last production or preparation operation is subject

²according to Regulation (EU) 2018/848, current version, Chapter IV, Article 30, (5), a)

³each 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)

⁴the place where the agricultural raw materials of which the product is composed have been farmed