

Organic products: Lists of high-risk countries and products

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EU clarifies criteria for placing organic products on a high-risk list

Commission Delegated Regulation (EU) [2025/2651](#) of 16 October 2025 amending Delegated Regulation (EU) 2021/1698 as regards certain criteria for the establishment of the list of high-risk third countries and high-risk products

Update

The European Commission has amended the criteria for determining which organic products should be placed on its forthcoming list of high-risk products that will require more frequent controls. This list will be based on suspicions of non-compliance, in addition to cases of non-compliance that are already established.

Impacted products

All products

What is changing?

The European Union (EU) will establish a list of organic products where there is a high risk of non-compliance with EU organic rules, and the countries in which they are produced (Regulation [2021/1698](#), Art. 8). Products identified as “high-risk” are subject to more frequent identity and physical checks by control authorities/bodies. The frequency of checks is risk-based, and so will depend on how high the risk of non-compliance is assessed to be.

Under this Regulation, the European Commission allows the identification of high-risk products to be based not only on *established* non-compliance, but also where non-compliance is *suspected*.

Why?

In many cases, where there is a suspicion of non-compliance of organic products, it is not possible for the control authority carrying out an investigation to establish (prove) this, due to a lack of information on the potential source or cause of contamination.

This Regulation changes the criteria for high-risk listing, allowing authorities to increase controls in cases where there is a suspicion of non-compliance.

Timeline

The Regulation applies from **26 December 2025**. The European Commission is expected to publish the list of high-risk products in the first quarter of 2026.

Recommended Actions

Non-EU countries should strengthen preventive controls, traceability, and investigation of suspected organic non-compliances, as the threshold for increasing import controls has been lowered.

Background

Control authorities undertake investigations in response to EU Member State notifications in the Organic Farming Information System ([OFIS](#)), a network for information exchange between the European Commission, Member States, and control authorities.

While there is currently no list of high-risk products set out in legislation, the European Commission provides recommendations annually to organic control authorities and control bodies on products and origins regarding the percentage of consignments that should be checked. These recommendations are made in discussion with the Group of Experts on Organic Production, based on information gathered through OFIS.

Resources

Commission Delegated Regulation (EU) [2021/1698](#) with procedural requirements for the recognition of organic control authorities and control bodies

Regulation (EU) [2018/848](#) on organic production and labelling of organic products

Sources

Regulation (EU) [2025/2651](#) as regards certain criteria for the establishment of the list of high-risk third countries and high-risk products

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