

Revision of permitted substances for use in organic production (2025)

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EU proposes authorisation of pea/potato protein and delays review of disinfectants

Draft Commission Implementing Regulation amending Implementing Regulation (EU) 2021/1165 as regards the use of certain products and substances in organic production

Commission Implementing Regulation (EU) [2025/973](#) of 23 May 2025 amending and correcting Implementing Regulation (EU) 2021/1165 authorising certain products and substances for use in organic production and establishing their lists

Update

In August 2025, the European Commission proposed to update the list of substances that may be used in the production of organic products for the European Union (EU) market to include protein extract from peas and potatoes for clarifying fruit juices, fruit wines, and mead.

It also proposes to allow the continued use of the substances that are currently authorised for cleaning and disinfection of buildings and installations for animal production (Regulation [889/2008](#), Annex VII) until 31 December 2027. The initial aim was for an evaluation to be completed by the end of 2025, but this has been delayed.

This proposal has been notified to the World Trade Organization Technical Barriers to Trade (WTO TBT) Committee ([G/TBT/N/EU/1151](#)).

The list of substances and products that can be used in the production of organic products for the EU market was updated in July 2025, with additions to the lists of authorised low-risk active substances, fertilisers, feed materials, feed additives, and food additives.

The EU has also authorised certain substances that may only be used in products produced in non-EU countries due to specific requirements in those countries: micro-organisms used as biological control agents, and ethylene for flower induction in pineapple.

Impacted products

Organic products

What is changing?

Proposed changes

The European Commission proposes to update the list of substances that may be used in organic production to include protein extract from peas and potatoes for clarifying fruit juices, fruit wines, and mead.

The Expert Group for Technical Advice on Organic Production (EGTOP) is still evaluating which substances can be authorised for cleaning and disinfection in organic production. These lists will not be completed by the end of 2025 as scheduled, so the existing list of substances authorised specifically for cleaning and disinfecting ponds, cages, tanks, raceways, buildings, or installations for animal production (Regulation [889/2008](#), Annex VII) will continue to apply until 31 December 2027.

Adopted changes

Adopted in July 2025, Regulation [2025/973](#) makes a number of additions and amendments to the lists of substances authorised for use in organic products that are imported into the EU (Annexes to Regulation [2021/1165](#)).

In particular, the following are added to the list of substances that may be used in organic production (Annex VI):

- micro-organisms including viruses, when used as biological control agents. These must not be from genetically modified organisms (GMOs) or produced using media of GMO origin
- ethylene for flower induction in pineapple.

Additions to the lists of authorised low-risk active substances, fertilisers, feed materials, feed additives, and food additives are summarised in Table 1.

Those substances for which there has been an amendment to the description and/or conditions of use are summarised in Table 2.

Details of these changes can be found in the Annex to Regulation [2025/973](#).

Why?

The changes to the list of low-risk substances in Regulation [2025/973](#) reflect the renewal of approvals of these substances under Regulation [1107/2009](#).

The changes to fertilisers, feed additives, and the use of micro-organisms and ethylene in non-EU countries' organic production, and the proposed inclusion of potato and pea protein, are based on recommendations from the European Commission's Expert Group for Technical

Advice on Organic Production (see [EGTOP reports on organic production](#)).

Timeline

Regulation [2025/973](#) applies from **15 June 2025**.

The proposal authorising protein extract from peas and potatoes, and extending the permitted use of substances for cleaning and disinfecting animal installations, is expected to be adopted in the fourth quarter of 2025.

What are the major implications for exporting countries?

Operators in non-EU countries are recommended to reconfirm with their certification body which substances are authorised for use under the new EU organic rules. Dossiers may need to be submitted to the EU in the case of some substances that were previously used under the old equivalence rules, but which now require specific EU authorisation for use on organic exports (provided they are registered for use in the country of origin).

Recommended Actions

Countries that are members of the WTO may submit comments on this proposal, via the [National TBT notification authority](#) of the country concerned, to the [EU TBT Enquiry Point](#) until **12 October 2025**.

Background

The Organic Regulation (EU) [2018/848](#) lays down the EU rules on organic production and labelling of organic products. It revised and strengthened the controls system, trade regime, and production rules that had been in place since 2007. The move from the principle of equivalence to the principle of conformity marked a fundamental change to the regulatory approach. The earlier Regulation (EC) [834/2007](#) recognised that organic goods could be produced in ways that were different, but equivalent in terms of their outcome and alignment with organic principles. Under the new Regulation, producers in non-EU countries that do not have equivalence recognised in a trade agreement with the EU, or are not recognised as an equivalent country under Regulation 834/2007, will have to conform with exactly the same set of rules as those in the EU.

In certain instances, farmers in non-EU countries, with specific conditions that are different from EU production conditions, will require different tools. Recognised control authorities/bodies can ask the Commission to evaluate and authorise additional substances in non-EU countries for use in the production of organic products for the EU market (Regulation [2021/1165](#), Art. 10).

For further information see [New EU Organic Regulation Explained](#).

Resources

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

Commission Regulation [2021/1165](#) authorising certain products and substances for use in organic production and establishing their lists

Commission Regulation [2023/2229](#) amending and correcting Regulation 2021/1165 authorising certain products and substances for use in organic production and establishing their lists

Commission Regulation [889/2008](#) laying down detailed rules on organic production and labelling of organic products with regard to organic production, labelling and control [repealed, but Annex VII still relevant]

European Commission: [EGTOP reports on organic production](#)


Sources

[Draft](#) Commission Implementing Regulation amending Implementing Regulation (EU) 2021/1165 as regards the use of certain products and substances in organic production


Commission Implementing Regulation (EU) [2025/973](#) amending and correcting Implementing Regulation (EU) 2021/1165 authorising certain products and substances for use in organic production and establishing their lists

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Table & Figures

Table 1 Additions to Annexes of Regulation 2021/1165 ^[a]					
Additions to authorised list of:					
Low-risk active substances	Fertilisers, soil conditioners, and nutrients	Feed materials	Feed additives and processing aids	Food additives and processing aids	Substances that may be used in organic production in non-EU countries
Annex I	Annex II	Annex III(A)	Annex III(B)	Annex V	Annex VI
Lavandulyl senecioate	Carbon dioxide	Single-cell proteins from <i>Trichoderma viride</i> and <i>Aspergillus oryzae</i>	Calcium propionate (preservative)	Buffered vinegar	Micro-organisms including viruses, when used as biological control agents ^[c]
Potassium hydrogen carbonate ^[b]	Calcium acetate	Products from <i>Bacillus subtilis</i> rich in protein	Iron(II) fumarate (nutritional additive, compounds of trace elements)	Fermentation activators	Ethylene for flower induction in pineapple
Straight-chain lepidopteran pheromones (acetates)	Calcium phosphate	Calcium stearate	Ethanol (processing aid)		
Sheep fat ^[b] (used as repellent by smell)	Plant fibre mats		Papain (processing aid)		
Quartz sand ^[b]	Calcium and magnesium gluconate				
Silicon dioxide					
<p>[a] For details of the description, specific limits, and conditions, see Regulation 2025/973.</p> <p>[b] Moved to category “low-risk active substances” from category “active substances other than basic substances”.</p> <p>[c] These must not be from genetically modified organism (GMOs) or produced using media of GMO origin.</p> <div>  www.agrininfo.eu </div>					

Source: Annex to Regulation [2025/973](#)

Table 2 Changes to description/conditions of use in Annexes of Regulation 2021/1165				
Low-risk active substances	Fertilisers, soil conditioners, and nutrients	Feed materials	Feed additives and processing aids	Food additives and processing aids
Annex I	Annex II	Annex III(A)	Annex III(B)	Annex V
Pheromones and other semio-chemicals	Products and by-products of plant origin; stone meal, clays, and clay minerals	Calcium chloride and propylene glycol	Lecithin and iron dextran	Yeasts for wine production and lactic acid bacteria
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Source: Annex to Regulation [2025/973](#)

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