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

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EU authorises pea/potato protein and delays review of disinfectants

Commission Implementing Regulation (EU) 2025/2501 of 11 December 2025 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

The EU has authorised the use of protein from peas and potatoes for the clarification of fruit juices, fruit wines, and mead. These will be included in the list of substances that may be used to produce organic products for the European Union (EU) market.

The European Commission's Expert Group for Technical Advice on Organic Production (EGTOP) has started an evaluation of substances to be authorised for cleaning and disinfection in organic production. As this evaluation is taking longer than anticipated, the list of substances currently authorised for cleaning and disinfection of buildings and installations for animal production will continue to apply until 31 December 2027.

Impacted products

Organic fruit juices, fruit wines, mead

What is changing?

Regulation 2025/2501 authorises the use of protein from peas and potatoes as processing aids for the clarification of fruit juices, fruit wines, and mead. These will be included in the list of substances that may be used to produce organic products for the EU market (Regulation 2021/1165, Annex V).

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EGTOP is still evaluating which substances can be authorised for cleaning and disinfection in organic production. 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.

Regulation 2025/973 updates the list of substances and products that can be used to produce organic products for the EU market (see Table 1). There are additions to the lists of authorised low-risk active substances, fertilisers, feed materials, feed additives, and food additives (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.

Substances where 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 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**.

Regulation 2025/2501 applies from **1 January 2026**.

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Recommended Actions

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).

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]

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European Commission: EGTOP reports on organic production

Sources

Commission Implementing Regulation (EU) 2025/2501 as regards the use of certain products and substances in organic production

Commission Implementing Regulation (EU) 2025/973 authorising certain products and substances for use in organic production and establishing their lists

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Tables & 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 *Trichoderma viride* and *Aspergillus oryzae*	Calcium propionate (preservative)	Buffered vinegar	Micro-organisms including viruses, when used as biological control agents[c]
Potassium hydrogen carbonate[b]	Calcium acetate	Products from *Bacillus subtilis* 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					

[a] For details of the description, specific limits, and conditions, see Regulation 2025/973.
[b] Moved to category "low-risk active substances" from category "active substances other than basic substances".
[c] These must not be from genetically modified organism (GMOs) or produced using media of GMO origin.

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Source: Annex to Regulation 2025/973

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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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