



**EUROPEAN COMMISSION**  
 DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT  
 DEPUTY DIRECTOR GENERAL, IN CHARGE OF DIRECTORATES A, B AND C

Brussels,  
 [redacted]/agri.ddg1.b.4(2016)7610002

[redacted]

Thank you for your email in which you have asked about the labelling of organic processed food.

As you correctly indicated, Article 23, paragraph 4, letter (a) of Regulation (EC) No 834/2007 sets out the rules on the use of the terms referring to organic production in the sales description of a product. In order to do so, the product has to comply with the production rules set out in Article 19 and at least 95% by weight of its ingredients have to be organic.

It is possible therefore that the percentage of organic ingredients could be higher than 95%, however, the Regulation does not provide for the possibility to label a product as 100% organic.

Regarding your second question, please note that the sentence "**the list of ingredients shall indicate which ingredients are organic**" applies to all cases of Article 23(4) of Regulation (EC) No 834/2007, including letter (a). Therefore it is obligatory to define in the list of ingredients which are organic, even if as you state all the ingredients are organic.

In addition, note that even though water is not taken into account in order to determine whether a product is produced mainly of agricultural ingredients (Article 19 of Regulation (EC) No 834/2007), it is still an ingredient which should be indicated in the list of ingredients.

The present opinion is provided on the basis of the facts as set out in your email and on the understanding that in the event of a dispute involving Union law, it is, under the Treaty on the functioning of the European Union, ultimately for the Court of Justice of the European Union to provide a definitive interpretation of the applicable Union law.

Yours sincerely,

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