



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B. Quality, Research & Innovation, Outreach  
**B.4. Organics**

Brussels,  
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Thank you for your message concerning the use of silage additives in organic feed production, please excuse the delay in reply.

Feed additives may only be used in the processing of organic feed in so far as they are authorised for use in organic production; i.e. included in the list set out in Annex VI (Article 16, Council Regulation (EC) No 834/2007<sup>1</sup>).

Annex I.1 of Council and Parliament Regulation (EC) No 1831/2003<sup>2</sup> on additives for use in animal nutrition gives a definition of preservatives and silage additives. In the stated regulation preservatives are defined as substances or, when applicable, micro-organisms which protect feed against deterioration caused by micro-organisms or their metabolites. Silage additives are defined as substances, including enzymes or micro-organisms, intended to be incorporated into feed to improve the production of silage.

Since silage is a type of feed, substances listed under allowed preservatives in Annex VI of Commission Regulation (EC) No 889/2008<sup>3</sup> can in principle be used in the preparation of silage. On the other hand, substances mentioned under silage additives cannot be used as additives in other types of feed. In other words; they can only be used in silage and as you correctly state only in case weather conditions do not allow for adequate fermentation. Please note that Annex IV of Parliament Regulation (EC) No 1831/2003 gives specific conditions for the use of additives, these rules also apply to organic agriculture.

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<sup>1</sup> Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products and repealing Regulation (EEC) No 2092/91 (OJ L 189, 20.07.2007, p. 1)

<sup>2</sup> Regulation (EC) No 1831/2003 of the European Parliament and of the Council of 22 September 2003 on additives for use in animal nutrition, (OJ L 268, 18.10.2003, p. 29–43)

<sup>3</sup> Commission Regulation (EC) No 889/2008 of 5 September 2008 laying down detailed rules for the implementation of Council Regulation (EC) No 834/2007 on organic production and labelling of organic products with regard to organic production, labelling and control, (OJ L 250, 18.9.2008, p. 1–84)

The present opinion is provided on the basis of the facts as set out in your letter of 17 March 2016 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 European Court of Justice to provide a definitive interpretation of the applicable Union law.

Yours sincerely,

