



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B. Quality, Research & Innovation, Outreach
Director

Brussels,
PP/nb(2018)6949788

Dear [REDACTED],

Thank you for your e-mail of 11 October 2018 (Int. Ref. ARES (2018)5278774) in which you requested our opinion on whether UV radiation (290-320 nm) could be used in organic production of mushrooms. In addition, in your e-mail, you also mentioned that: *"In conventional mushroom production, UV radiation is sometimes used at the end of the production cycle. The UV radiation 'generates' Vitamin D in the mushrooms. According to our information UV B-radiation (290-320 nm) is used. The UV radiation used, is the lower ultraviolet part of the electromagnetic spectrum and is considered non-ionizing radiation. The use of UV (UV-B radiation) does not seem to fall under the prohibition of article 10 of regulation 834/2007."*

According to recital (1) of Regulation (EC) No 834/2007¹ "organic production is an overall system of farm management and food production that combines best environmental practices, a high level of biodiversity, the preservation of natural resources, the application of high animal welfare standards **and a production method in line with the preference of certain consumers for products produced using natural substances and processes** [...]".

In accordance with Article 3 of Regulation (EC) No 834/2007, one of the general objectives of organic production is to "establish a sustainable management system for agriculture that **respects nature's systems and cycles** and sustains and enhances the health of soil, water, plants and animals and the balance between them". In addition, Article 4 of Regulation (EC) No 834/2007 lays down the overall principles applicable to organic production, and accordingly, organic production should be based on "the appropriate design and management of **biological processes based on ecological systems using natural resources** which are internal to the system by methods that (i) use living organisms and mechanical production methods, [...] and (b) the **restriction of the use of external inputs**; where external inputs are required or the appropriate management practices and methods referred to in paragraph (a) do not exist, these shall be limited to: (i) inputs from organic production;(ii) natural or naturally-derived substances; [...]".

¹ 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)

[REDACTED]

The Commission services are of the opinion that using UV radiation at the end of the production cycle to generate Vitamin D in mushrooms is not compatible with the objectives and principles of organic production laid down in Regulation (EC) No 834/2007.

The present opinion is provided on the basis of the facts as set out in your e-mail of 11 October 2018 and expresses the view of the Commission services and does not commit the European Commission. 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,

A handwritten signature in blue ink, appearing to read 'N. Sauze-Vandevyver', with a stylized flourish at the end.

Nathalie SAUZE-VANDEVYVER