



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability

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I would like to thank you for your email¹ of 7 February 2022 expressing your concern regarding procedural aspects related to Commission Delegated Regulation C (2022)101², which is currently under scrutiny by the European Parliament and the Council. This act will amend Annex II to Regulation (EU) 2018/848³.

I would like to recall that the finalisation of the proposal was particularly complex. As you know, the first proposal focused on the subject of seedlings. However, in view of the results from the Feedback mechanism - more than 400 comments were received from the sector - and the reaction of GREX experts in the meeting of September 2021, the services of the Commission have been working to identify solutions to address the wider technical concerns of the sector, regarding, in particular, the lack of availability of mother plants grown organically in the fruit and vine sectors.

After a comprehensive technical assessment of these new comments and contributions, the services of the Commission presented a wider proposal in November to the GREX, introducing the new provisions for the authorisation of operators producing plant reproductive material. On the basis of comments received and further internal examination, the final text was modified but only to remove the labelling provisions on differentiated labelling and to add monitoring provisions for competent authorities and the Commission in line with the provisions of Article 53 of Regulation (EU) 2018/848. Hence, the final text was circulated on 17 December 2021 to all GREX experts and was adopted on 17 January 2022. This final text does not require operators to adapt to new labelling conditions.

I am aware of the difficulties linked to all the process. However, as you are well aware, the new delegated provisions have been required to permit adaptation for the nursery sector, confronted with the lack of mother plants organically grown in particular for fruits and vine.

¹ ARES (2022) 876458

² Commission Delegated Regulation (EU) .../... of XXX amending Annex II to Regulation (EU) 2018/848 of the European Parliament and of the Council as regards specific requirements for the production and use of non-organic, in-conversion and organic seedlings and other plant reproductive material –C(2022)101

³ [Regulation \(EU\) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation \(EC\) No 834/2007 \(OJ L 150, 14.6.2018, p. 1\).](#)

Finally, I can reassure you that we are working to address all questions from the delegates in a comprehensive manner and with due urgency. Please note that we intend to include a comprehensive chapter on PRM in the FAQ document available on the European organic webpage.

Yours sincerely,

