



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability

Brussels

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Dear Sir,

I would like to thank you for your email of 16 March 2022¹, in which you ask for clarifications regarding beeswax in organic production. You ask in particular whether beeswax can still be used as an input into organic production.

As you know, since 1 January 2022, Regulation (EU) 2018/848 of the European Parliament and of the Council on organic production and labelling of organic products² applies. Beeswax is among the products listed in Annex I to that Regulation and hence is now covered by the scope of the organic legislation in accordance with the provisions of Article 2(1): “*This Regulation also applies to certain other products closely linked to agriculture listed in Annex I to this Regulation, where they are, or are intended to be, produced, prepared, labelled, distributed, placed on the market, imported into or exported from the Union.*” It means that, since 1 January 2022, beeswax can be certified as organic provided it complies with the relevant provisions of Regulation (EU) 2018/848.

Beeswax can be used as an input in organic beekeeping; I refer in particular to the provisions of point 1.2.2 (f) of part II of Annex II to Regulation (EU) 2018/848 on conversion:

“Conversion periods specific to the type of animal production are set out as follows: (...) (f) 12 months for bees.

During the conversion period, the wax shall be replaced with wax coming from organic beekeeping.

However, non-organic beeswax may be used:

- (i) where beeswax from organic beekeeping is not available on the market;*

¹ Ares (2022)1928186

² [CL2018R0848EN0020010.0001.3bi_cp 1..1 \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2018/848/oj)

(ii) where it is proven free of contamination with products or substances not authorised for use in organic production;

and (iii) provided that it comes from the cap; the beeswax for new foundations shall come from organic production units;”

Please note also the provisions of point 1.9.6.5 (e) of part II of Annex II to Regulation (EU) 2018/848 related to housing and husbandry practices for bees stating: “*With regard to housing and husbandry practices, the following rules shall apply: (...) (e) the beeswax for new foundations shall come from organic production units;*”.

Finally, beeswax is listed respectively in sections A1 (food additives) and A2 (processing aids) of Annex V to Commission Implementing Regulation (EU) 2021/1165³ as the food additive E 901 authorised to be used as a confectionery glazing agent only when coming from organic production and as a processing aid authorised as a releasing agent for products of plant origin only when coming from organic production.

This opinion is provided on the basis of the facts set out in your letter of 16 March 2022 and expresses the opinion 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 Court of Justice of the European Union to provide a definitive interpretation of the applicable Union law.

Yours sincerely,



³ [Publications Office \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2021/1165/oj)