



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability

Brussels

agri.b.4(2022)2279774

Dear [REDACTED],

I would like to thank you for your email of 28 February¹, in which you asked for clarifications regarding the organic production rules for deer.

In your email, you explained that, after comparing the English, Swedish and German language versions of Regulation (EU) 2018/848 on organic production², you would like to receive clarifications regarding the meaning of “natural grazing” in point 1.9.2.1 (f), related to the nutrition of cervine animals, of Part II of Annex II to Regulation (EU) 2018/848 from both your German colleagues and the Commission.

Point 1.9.2.1 (f) of Part II of Annex II to Regulation (EU) 2018/848 states the following: “(f) natural grazing shall be ensured in a pen during the period of vegetation. Pens that cannot provide feed by grazing during the period of vegetation shall not be allowed;”

These provisions should be read together with the provisions of point 1.9.2.1 (b), (c), and (g) of Part II of Annex II to Regulation (EU) 2018/848, which state the following:

“(b) animals shall have access to pasturage for grazing whenever conditions allow;

(c) where animals have access to pasturage during the grazing period and where the winter housing system allows the animals to move freely, the obligation to provide open air areas during the winter months may be waived;

(d) rearing systems shall be based on maximum use of grazing pasturage by reference to the availability of pastures in the different periods of the year;

(g) feeding shall only be allowed in the event of a shortage of grazing due to poor weather conditions;”

¹ Ares (2022) 473578

² [EUR-Lex - 02018R0848-20220101 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2018/848/oj)

On this basis, I confirm that the term “natural grazing” in Point 1.9.2.1 (f) of Part II of Annex II to Regulation (EU) 2018/848 does not refer to natural land but to farmland for grazing.

This opinion is provided on the basis of the facts set out in your letter of 28 February 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 faithfully,



c.c.:

