



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability

Brussels

agri.b.4(2022)2225681

Dear [REDACTED]

I would like to thank you for your email<sup>1</sup> of 3 March 2022, in which you ask for clarification with respect to a previous reply concerning kombucha/scoby, currently included in the Frequently Asked Questions document<sup>2</sup> available on the EU organic webpage as follows:

*“ 2) Can Kombucha also known as "scoby" be certified as organic?*

*Kombucha culture or scoby is a symbiotic colony of bacteria and yeast. Processed agricultural products for use as food and yeast fall under the scope of the EU organic legislation as set out in Article 2(1) of Regulation (EU) No 2018/848. Therefore, kombucha tea and scoby can be certified as organic provided that the rules for the production and labelling of processed food are complied with.*

*Annex II part IV point 2.2.2. of Regulation (EU) No 2018/848 authorises the use of "preparations of micro-organisms and food enzymes normally used in food processing". If kombucha tea is produced by adding to organic tea a preparation of yeast and micro-organisms and enzymes, which could be considered as normally used in food processing, the beverage can be certified as organic.*

*However, if kombucha tea is produced by adding scoby (yeast and bacteria) as an ingredient, the scoby (as ingredient) has to comply with the production rules of organic yeast set out in Annex II Part VII of Regulation (EU) No 2018/848.*

*If the rules on production of organic yeast are respected, the scoby can be certified as organic and added as an ingredient in the production of organic beverages. As a result, kombucha tea and scoby can be certified as organic, provided that the rules for the production of organic processed food are respected and complied with.”*

In particular, you consider that “scoby” is not yeast and not an agricultural product either and you suggest that it should be considered a preparation of microorganisms and, as such, scoby could be used in organic products, but not certified organic.

<sup>1</sup> ARES (2022)1570080

<sup>2</sup> ARES(2021)6691927

You ask in particular: *“How do you see the scoby as an ingredient that can be produced organically in accordance with the production rules of organic yeast? (Do you for instance consider scoby as a yeast, produced by adding bacteria (a preparation of micro-organisms?)*

Indeed, I confirm that our reply is based on that consideration: scoby is a colony of yeast and bacteria and, when placed on the market as traditional food, a yeast formulation can be in itself certified organic, when produced in line with the provisions of Annex II part VII of Regulation (EU) 2018/848<sup>3</sup>.

This opinion is provided on the basis of the facts set out in your letter of 3 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,



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<sup>3</sup> [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 \(OJ L 150, 14.6.2018, p. 1\).](#)