



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability  
The Director

Brussels

[REDACTED]

I would like to thank you for your email of 21 October 2022<sup>(1)</sup>, in which you asked questions regarding the possibility to have both organic and conventional production of cattle in a holding and also to change the graphic design of the organic operator certificate in TRACES. Please accept my apologies for the late reply.

In your email, you ask whether it is possible to have an organic unit with grazing cows and a conventional unit with grazing horses under one holding. You want to know whether the grasslands for cows have to be organic and the grasslands for horses have to be conventional.

In order to reply to your question, I would like to start by recalling the definitions of holding and organic and non-organic production unit as laid down in Article 3 of Regulation (EU) 2018/848 <sup>(2)</sup>:

“(8) ‘holding’ means all the production units operated under single management for the purpose of producing live or unprocessed agricultural products, including products originating from aquaculture and beekeeping, referred to in point (a) of Article 2(1) or products listed in Annex I other than essential oils and yeast;

(9) ‘production unit’ means all assets of a holding, such as primary production premises, land parcels, pasturages, open air areas, livestock buildings or parts thereof, hives, fish ponds, containment systems and sites for algae or aquaculture animals, rearing units, shore or seabed concessions, and premises for the storage of crops, of crop products, of algae products, of animal products, of raw materials and of any other relevant inputs managed as described in point (10), point (11) or point (12);

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<sup>(1)</sup> Ares (2022) 7433941

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

*(10) ‘organic production unit’ means a production unit, excluding during the conversion period referred to in Article 10, which is managed in compliance with the requirements applicable to organic production; (...)*

*(12) ‘non-organic production unit’ means a production unit which is not managed in compliance with the requirements applicable to organic production;”*

I would also like to refer to the general production rules related to the conditions for the same holding to have both an organic and a non-organic production unit, as laid down in paragraphs (2) and (7) of Article 9 of Regulation (EU) 2018/848, which state the following:

*“2. The entire holding shall be managed in compliance with the requirements of this Regulation that apply to organic production.*

*7. Notwithstanding paragraph 2, a holding may be split into clearly and effectively separated production units for organic, in-conversion and non-organic production, provided that for the non-organic production units:*

*(a) as regards livestock, different species are involved;*

*(b) as regards plants, different varieties that can be easily differentiated are involved.”*

Hence, it is indeed possible to have a holding with both an organic production unit with grazing cows and a non-organic production unit with grazing horses since they are different species of cattle, provided that the organic production unit with the organic grasslands where the organic cows graze is split clearly and effectively separated from the non-organic production unit with the non-organic grasslands where the non-organic horses graze. The assessment of the concrete situation falls of course under the responsibility of the national authorities which must ensure the correct implementation of the EU legislation.

In your email, you also ask whether it is possible to change the graphic layout of the template of the certificate provided all the mandatory elements are included. Please note that the graphical layout of the certificate of operators cannot be changed in TRACES at this moment. This layout is a standard one for all TRACES certificates.

The present opinion is provided on the basis of the facts as set out in your email of 21 October 2022 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,

