

Voluntary Report – Voluntary - Public Distribution

Date: January 05, 2026

Report Number: E42026-0001

Report Name: EU Commission Proposes Revisions to EU Organics Regulation

Country: European Union

Post: Brussels USEU

Report Category: Special Certification - Organic/Kosher/Halal

Prepared By: Sophie Bolla

Approved By: Tyler Babcock

Report Highlights:

On December 16, 2025, the European Commission published a proposal to revise the EU Organic Regulation. The aspects of the proposal that will impact the United States include the Commission's effort to postpone the deadline for the transformation of equivalency arrangements into trade agreements, currently set for December 31, 2026, to December 31, 2036, and the Commission's proposal to adapt rules on labelling of organic products imported from third countries.

On December 16, 2025, the European Commission published [a proposal](#) to revise the EU Organic Regulation ([Regulation 2018/848](#)), which entered into force four years ago¹.

In addition to the legislative proposal, the Commission published a [roadmap](#) for further actions aimed at reviewing additional elements of the organic legal framework, notably the organic secondary legislation. The review aims to focus on specific issues that are considered to represent a burden for EU farmers and other operators.

Revisions to the Organic Regulation Impacting US Products

The Commission has proposed a series of revisions to its Organic Regulation, two of which may have substantial impact on the [U.S.-EU Equivalency Arrangement](#) signed in 2012.

First, because EU Organic Regulation 2018/484 obligates the EU to transform its equivalency arrangements² into trade agreements before December 31, 2026, current organic equivalency arrangements, including with the United States, will expire at the end of this year. The Commission proposes to postpone the deadline from December 31, 2026, to December 31, 2036, to allow for further technical exchanges with third countries. The 10-year extension of the deadline would give the Commission time to conclude technical exchanges with third countries to avoid disruptions in the trade of EU organic products.

The Commission has also proposed changes to rules regarding the use of the EU organic logo in light of the judgement of the Court of Justice of the European Union (ECJ) in Case C-240/23 Herbaria Kräuterparadies II. In that case, the ECJ ruled that the EU Organic Regulation (Regulation 2018/848) prohibits the use of the EU organic logo on products manufactured in third countries if they do not strictly follow EU organic rules, even if the third country has an equivalency arrangement. To comply with the ruling, the Commission proposes allowing the use of the EU logo only if the products from the third country, already covered by an equivalency arrangement, comply with additional production and control requirements. These new requirements are listed in Annex VII and include hydroponic production and the prohibition of isolation of livestock, amongst other additional requirements. The proposed regulation also allows for further additional requirements to be defined later by the Commission through secondary legislation. The new rules on the use of the EU organic logo will also apply to organic products made in the EU if more than 5 percent of the ingredients come from a third country. The change may lead EU food producers to switch from third-country suppliers to domestic suppliers in an effort to keep the EU organic logo.

Next Steps

The publication of this proposal initiates the beginning of the EU legislative process. The European Parliament and the Council of the European Union, as co-legislators, will now assess the Commission's legislative proposal. Amendments to the legislative proposal are made separately by the Parliament and Council; however, negotiations will eventually occur to find institutional agreement before the proposals are adopted as official EU law.

According to the USDA Foreign Agricultural Service's Global Agricultural Trade System, in 2024, U.S. organic exports to EU were \$3 million USD and U.S. organics imports were \$550 million, indicating the United States has a \$547 million USD trade deficit with the EU for organic agricultural products. Please note that these figures are based on the limited classification codes available for organic and, thus, actual trade is likely much higher.

Attachments:

No Attachments.