



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B. Quality, Research & Innovation, Outreach
Director

Brussels,
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[REDACTED]

Thank you for your email of 14 December 2018 (Int. Ref. ARES (2019)99597) asking a clarification on whether a logo managed by Sudvinbio to identify in conversion organic wine producers of Occitanie is officially recognised on wine labels in EU. Please accept our apologies for this late reply.

According to Article 23(1) and (2) of Regulation (EC) No 834/2007, the use of the terms referring to the organic production method such as ‘bio’ and ‘eco’ may be used throughout the Union for the labelling and advertising of products that satisfy the requirements set out in that Regulation. The use of those terms is not allowed in the labelling, advertising and commercial documents of a product that does not satisfy the requirements set out under Regulation (EC) No 834/2007¹.

Article 25(1) of Regulation (EC) No 834/2007 prohibits the use of the EU organic logo in the case of **in-conversion products** and food as referred to in Article 23(4)(b) and (c) of Regulation (EC) No 834/2007.

However, Article 62 of Regulation (EC) No 889/2008 lays down specific labelling requirements for in-conversion products of plant origin such as wine. The referred provision allows labelling in-conversion products with the indication ‘**product under conversion to organic farming**’ under the condition that:

- “(a) a conversion period of at least 12 months before the harvest has been complied with;
- (b) the indication shall appear in a colour, size and style of lettering which is not more prominent than the sales description of the product, the entire indication shall have the same size of letters;
- (c) the product contains only one crop ingredient of agricultural origin;
- (d) the indication is linked to the code number of the control body or control authority as referred to in Article 27(10) of Regulation 834/2007.

Finally, Article 25(2) of Regulation 834/2007 lays down that “National and private logos may be used in the labelling and advertising of products which satisfy the requirements set out under this Regulation”.

Therefore, the use of private logos for the labelling of in-conversion wine products is subject to the compliance with other requirements explained above.

The present opinion is provided on the basis of the facts as set out in your letter of 14 December 2018 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,



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