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BIOØKONOMI

European Commission

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Organic farming – authorisations for the use of non-organic protein feed

The initiative extends the possibility for Member States to authorise the use of up to 5% non-organic protein feed for young organic poultry and pigs. This will help ensure that their need for specific amino acids is met during growth.

Draft act feedback period 03 August 2026 - 31 August 2026.

Comments from The Norwegian Institute of Bioeconomy Research (NIBIO)

Norwegian Institute of Bioeconomy Research (NIBIO), an independent research institute, is to contribute to food security and safety, sustainable resource management, innovation and value creation through research and knowledge production within food, forestry and other biobased industries.

NIBIO welcomes the opportunity to comment on the proposal to extend the derogation allowing the use of up to 5% non-organic protein feed for young monogastric animals, restricted to piglets up to 35 kg and young poultry. Professional assessments at NIBIO are done by the Division of Food Production and Society.

NIBIO considers it necessary to extend the derogation until 31 December 2036, provided that Member states confirm the lack of availability of suitable organic protein feed. Because the application of the derogation requires an assessment by the competent authority in each Member State, it will only apply where organic protein feed with an adequate amino acid composition is not available in sufficient quantities.

NIBIO supports the rationale that the correct amino acid composition is of special importance for young pigs and poultry. Because the availability of suitable organic protein sources with the right



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amino acid composition is still insufficient, further efforts are needed to encourage the production and market availability of such feed and to reduce the sector's dependency on non-organic protein feed.

While article 11 in Regulation (EU) 2018/848 prohibits the use of GMOs in organic production, we propose to consider to explicitly reiterating this requirement in the proposed amendment:

In Annex II to Regulation (EU) 2018/848, Part II is amended as follows:

(1) in point 1.9.3.1(c), in the introductory part, the date '31 December 2026' is replaced by '31 December 2036';

The sentence in (ii) is extended from '*it is produced or prepared without chemical solvents;*' to '*it is produced or prepared without chemical solvents and complies with the prohibition on the use of GMOs and products produced from or by GMOs laid down in Article 11;*'

(2) in point 1.9.4.2(c), in the introductory part, the date '31 December 2026' is replaced by '31 December 2036'.

The sentence in (ii) is extended from '*it is produced or prepared without chemical solvents;*' to '*it is produced or prepared without chemical solvents and complies with the prohibition on the use of GMOs and products produced from or by GMOs laid down in Article 11;*'

NIBIO considers this extension to be a transitional measure that should be accompanied by continued efforts to increase the production and marked availability of organic protein feed with an appropriate amino acid composition, thereby enabling a phase-out of the derogation in the future.

Kind regards

Per Stålnacke

Research director, NIBIO