



Council of the  
European Union

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From: General Secretariat of the Council

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To: Delegations

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No. Cion doc.: 15533/22

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Subject: Proposal for a Regulation of the European Parliament and of the Council  
on the labelling of organic pet food  
- Comments from the Netherlands delegation

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Delegations will find attached comments from the Netherlands delegation on the above mentioned proposal.

**Comments from the Netherlands delegation**

The NL supports the proposal from the Commission for a Regulation on the labelling of organic petfood in general. However, we do have some comments about the date of entry into force of the regulation. (art 5). We are of the view that the regulation should apply retroactively as of 1/1/22. Therefore NL would like to add in art. 5 a reference to art. 3 and art 4.1 so that there's no time gap between national and European legislation on labelling organic petfood. Furthermore, we could support proposals offering the petfood sector a transitional period for applying the organic production logo (art. 4.2).

Article	COM proposal	Alternative proposal
4.2	In the case of prepacked pet food bearing a term referred to in Article 30(1) of Regulation (EU) 2018/848, the organic production logo of the European Union shall appear on the packaging.	In the case of prepacked pet food bearing a term referred to in Article 30(1) of Regulation (EU) 2018/848, the organic production logo of the European Union shall appear on the packaging from 1 <sup>st</sup> July 2023.
5	This Regulation shall enter into force on the third day following that of its publication in the <i>Official Journal of the European Union</i> .	This Regulation shall enter into force on the third day following that of its publication in the <i>Official Journal of the European Union</i> .  <b>Article 3 and 4.1 shall apply from 1 January 2022.</b>