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From: General Secretariat of the Council

To: Delegations

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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 Finnish delegation

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

Comments from the Finnish delegation

In relation to the COM proposal 659 final on the labelling of organic pet food, Finland would like to ask for some clarification as follows.

Reg. 767/2009 lays down the labelling requirement for feed. According to Article 17 (1e) (specific mandatory labelling requirements for compound feed), each feed material must be listed in the label in descending order by weight calculated on the *moisture content [of 12 %]*. According to Article 17 (2c), the name of the feed material may be replaced by the *name of the category* to which the feed material belongs in case of pet food.

Based on the rules above, it is not totally clear how the proposed rules of COM 659 “at least 95 % of the agricultural ingredients of the product by weight are organic” (statement in the sales description and in the list of ingredients) or “less than 95 % of the agricultural ingredients of the product by weight are organic, and provided that those ingredients comply with the production rules set out in Regulation (EU) 2018/84” (statement only in the list of ingredients) corresponds to the existing, general (processed) feed labelling legislation.