

AnimalhealthEurope Feedback to the Commission Consultation on the Organic production - targeted updates and simplification

March 2026

AnimalhealthEurope, the association representing the manufacturers of veterinary medicines, vaccines and other animal health products welcomes the possibility to provide feedback to the call for evidence on targeted updates and simplification of the EU rules on organic production. We believe that this initiative is a good opportunity to improve the health and welfare of animals raised in organic production.

In a nutshell, we welcome:

- that the Proposal provides for a better harmonisation of the 48-Hour withdrawal rule, so that animal health products benefiting from a “zero-day” period are excluded from the 48-Hour withdrawal rule;

However, we regret that the Proposal fails to take into account the elements below:

- The harmonisation of the wording “*chemically synthesised allopathic veterinary medicinal products*” with Regulation 2019/6 on veterinary medicinal products;
- Ensuring immunocastration complies with EU organic pig production standards;
- Increased animal health and welfare through better access to pain relief in organic livestock.

Firstly, AnimalhealthEurope welcomes the harmonisation of the rules on the withdrawal period after the use of chemically synthesised allopathic medicinal products with Regulation (EU) 2019/6. This is an essential element for the health and welfare of the animals raised under organic systems. However, we regret that the Proposal fails to make further improvements on the following elements.

Harmonisation of technical wording with the sectorial legislation on Veterinary Medicines

We would like to highlight that recital 43 of Regulation 2018/848 on organic production and labelling of organic products refers to “*chemically synthesised allopathic veterinary medicinal products*” but no definition of such products exists in EU legislation (neither in Regulation 2018/848, nor in Regulation 2019/6 on veterinary medicinal products). This creates a problematic lack of harmonisation between different EU legislations. Instead, AnimalhealthEurope suggests using well defined wording from Regulation 2019/6.

Supporting immuno-castration in Organic Pig Production

As AnimalhealthEurope it is our wish to help all farmers focus on raising animals in a more environmentally sustainable way and under conditions supporting the health and welfare of their livestock. Thus, the animal health sector also helps to avoid food waste at source, and to reduce resource inputs like feed and water, contributing to the livelihood of farmers across the EU, while minimising their environmental footprint.

In this context AnimalhealthEurope calls on the Commission to support science-based and pain-free alternatives to piglet castration in organic farming - thus allowing the farmers to have a wide range of tools enabling them to have the responsibility to focus on sustainable management practices and to promote animal health and welfare, including allowing the use of *boar taint vaccination* - also referred to as immuno-castration. Immuno-castration meets the objectives of the EU organic legislation, namely to ensure that "during the life of the animals, including the time of slaughter, any pain, suffering and distress must be avoided and kept to a minimum".

Facilitated Access to Pain Relief in Organic Livestock

AnimalhealthEurope believes that the first sentence of Paragraph 1.5.2.2. of Annex II of Regulation 2018/848 stating that "*Disease shall be treated immediately to avoid suffering of the animal*" is essential and should be a priority for all farms.

However, the rest of Paragraph 1.5.2.2 of Annex II may undermine the implementation of the requirement that animals should be treated immediately: analgesics (even without antibiotics) are defined as "*chemically synthesised allopathic veterinary medicinal products*". Consequently, it could be interpreted that they always require a veterinarian to prescribe the pain relief, as they may only be used "*under the responsibility of a veterinarian*", even when they are not defined as prescription-only products.

Although we understand the idea behind this requirement, practice shows that it can be detrimental to the health and welfare of animals when it comes to pain relief products. There notably is a lack of veterinarians in rural areas, which can delay a vet's response and thus prolong an animal's pain. This may discourage farmers from consulting their veterinarians solely for pain-relief prescriptions, which is detrimental to animal health and welfare. Ultimately, farmers taking the risk to administer pain relief to their animals can lose their organic status.

AnimalhealthEurope calls on the Commission to clarify the status of analgesics, for example by amending Paragraph 1.5.2.2 of Annex II by using the empowerment to adopt delegated acts under Article 14.2(e)(iv) in order to allow trained farmers to administer certain analgesics under veterinary responsibility would improve animal health and welfare.