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Dear Emma,

THE ORGANIC PRODUCTION (AMENDMENT) REGULATIONS 2025

I am writing in response to the Rural Affairs and Islands Committee's request for further information regarding the above SI. I have addressed each of the Committee's points below.

Is the divergence with the EU on the age of pullets due to organic pullets being available in the EU but not in the UK? If so, why is this?

There remains an insufficient supply of organic pullets in GB to meet the current requirements of the sector, taking into consideration the GB organic egg sector is bigger than the equivalent sector in NI. There are no commercial scale pullet rearing units in GB and, Defra have advised that, based on recent and continued gathering of feedback from the organic Control Bodies and other relevant stakeholders, scaling up to the size required to meet demand would be a considerable job (e.g. planning permission, building work, converting land if necessary). The EU regulations 2018/848 provide detailed pullet and breeder flocks rules, which operators moved to over a transitional period following the introduction of regulation 2018/848.

Is it realistic (given the history of the extension of these derogations) that younger organic pullets are going to be available by end Dec 2026?

The UK and EU have agreed to work towards including organic production in the scope of the Sanitary and Phytosanitary Measures (SPS) Agreement. Subject to successful conclusion of the negotiations, I expect the primary impacts of this to be that the UK will regulate consistently with the EU in relation to organics. As previously mentioned, the EU regulations provide detailed pullet and breeder flocks rules, which is what is required in order to remove this derogation. I do not have an exact date for when the SPS negotiations will be concluded and the necessary legislative arrangements will be in place but my current expectations are that it should be no later than 2027.

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In practice, does every egg-producing chicken in the UK spend its first 18 weeks as non-organic?

As I mentioned above, there is an insufficient supply of organic pullets in GB to meet the current requirements of the sector. The Scottish Government does not have the information required to confirm if every egg producing chicken in the UK spends its first 18 weeks as non-organic.

Have there been any trade implications of diverging with the EU on the age of pullets that are permitted in organic production?

No. The Trade and Cooperation Agreement provides that the EU and the UK recognise their organics laws and regulations as equivalent. In light of EU Regulation 848/2018 coming into force on 1 January 2022, that equivalence was reassessed by both parties by 31 December 2023. Both parties confirmed they would continue to accept each other's organic standards as equivalent, with each side taking the necessary steps to ensure that trade in organic products between GB and the EU can continue.

Is there any ongoing work to establish “organic pullet standards and appropriate transitional rules”?

The detailed pullet and breeder flocks rules which are required in order to remove this derogation were being considered as part of the work on the GB organic regulation review. Defra have advised the regulatory review has been paused in light of the SPS Agreement and pending negotiations. As I have noted, I expect that as a result of the SPS Agreement we will regulate consistently with the EU, and this will therefore include moving to more detailed pullet and breeder flocks rules as currently outlined in the EU regulations.

In relation to protein feed:

What is the “strain” (this is the wording used in the notification) on the sectors regarding protein feed? Is it cost or availability?

As the competent authority for organic production, Defra have discussed the issues surrounding protein feed with the organic control bodies and they have highlighted the issue as sourcing sufficient quantities of organic protein feed. Currently, minimal suitable organic protein is produced in the UK, and the sector is reliant on imports. One key issue is achieving a balanced amino acid profile, which can affect the welfare of the animal – this continued derogation is to avoid this issue.

I hope this information is helpful for the Committee members when considering the SI. I look forward to hearing further from you by 10 October.



MAIRI GOUGEON