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DELIVERABLE 4.4

CERTIFICATION AND LABELLING

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Author	Tim Staufenberger (KMF), Katharina Csenteri (KMF)
Editor	Edited by Kristina Hartwig (KMF), Maya Miltell (SUBNET), Toninio Waelkens (SUBNET
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1. INTRODUCTION

Mussel farming in the Baltic Sea offers a dual benefit of environmental restoration and resource optimisation. By reducing eutrophication, it positively impacts the fragile marine ecosystem while creating opportunities to repurpose mussel byproducts into valuable agricultural inputs.

Due to low salinity, Baltic Sea mussels are often smaller and, therefore, not always suitable for the human consumption market. In the western Baltic Sea, small mussels are considered a side-stream of market-size mussel production. Baltic MUPPETS is a three-year project funded under the Interregional Innovation Investment (I3) Instrument and aims to create a new value chain for small mussels in the Baltic Sea Region (BSR) by developing high-value and healthy pet food products. The motivation behind this initiative lies in the prospect of simultaneously restoring the Baltic Sea ecosystem and harnessing byproducts to tackle pressing ecological and economic challenges. This unique convergence of environmental restoration and resource optimisation highlights the transformative potential of sustainable innovation.

The focus of this deliverable is on certification and labelling (Task 4.5) of pet food stemming from Baltic Sea blue mussels. It provides an examination of the current EU organic labelling framework and its implementation in Germany, Sweden, and Denmark. This includes an overview of national practices, highlighting similarities and differences in regulatory approaches across these countries. In addition, this deliverable presents a brief overview of the Aquaculture Stewardship Council (ASC) certification, comparing its requirements with EU regulations and national eco-labelling schemes, including the more stringent German private eco-labelling standards. In addition, general labelling requirements for commercial pet food are looked at.

The objectives of this deliverable are:

- To provide a comprehensive overview of organic labelling practices in Germany, Sweden, and Denmark.
- To examine Aquaculture Stewardship Council (ASC) certification and its alignment with EU and national regulatory frameworks.
- Look into general pet food labelling prerequisites.
- To facilitate the transfer of knowledge related to organic certification and labelling among project partners, supporting informed decision-making for companies and stakeholders interested in pet food certification and labelling processes.

By consolidating this information, the deliverable aims to serve as a practical guide for understanding current certification systems.

2. ORGANIC CERTIFICATON

2.1 EU-wide framework for organic certification

2.1.1 Legal basis and scope

The current legal basis for organic production and labelling in the European Union is Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 ("on organic production and labelling of organic products"). This regulation replaces the former Council Regulation (EC) No 834/2007 (and associated implementing rules) and has been fully applicable since 1 January 2022.[1,2,3]

The regulation applies to a broad range of products: "live or unprocessed agricultural products (including seeds and other reproductive plant material), processed agricultural products for food, feed, and in addition to certain other products closely linked to agriculture" (e.g. raw wool or cotton, cork, essential oils) when they are produced, prepared, labelled, distributed, placed on the market, imported into or exported from the Union.[4,5]

All operators involved at any stage of production, processing, storage, transport or trade of such products are subject to the regulation.[6]

2.1.2 Principles and production rules

The regulation establishes a holistic, ecology-centred production model grounded in sustainable management of natural resources, biodiversity, soil fertility, animal welfare and consumer protection. Key principles include[7]:

- Prohibition of genetically modified organisms (GMOs) and of ionising radiation in organic production.

[1]https://agriculture.ec.europa.eu/farming/organic-farming/legislation_en

[2]https://eur-lex.europa.eu/EN/legal-content/summary/eu-rules-on-producing-and-labelling-organic-products-from-2022.html

[3]https://www.europeansources.info/record/regulation-eu-2018-848-on-organic-production-and-labelling-of-organic-products-and-repealing-regulation-ec-no-834-2007

[4]https://www.legislation.gov.uk/eur/2018/848/chapter/I/data.html

[5]https://agriculture.ec.europa.eu/farming/organic-farming/organic-production-and-products_en

[6]https://www.bioagricert.org/en/certification/organic-production/european-union

[7]https://www.beingorganic.eu/en/european-regulations/

- Restrictions on the use of synthetic fertilisers, chemical herbicides or pesticides; instead, practices such as crop rotation, green manuring (nitrogen-fixing plants), mechanical or biological pest control, soil fertility management via ecological methods are required.
- In animal production: a requirement for species-appropriate (animal-welfare) husbandry, organic feed, prohibition of growth hormones, and strict conditions under which antibiotics or other veterinary treatments may be applied (only when necessary for animal health).

Further, the regulation extends to processing, transport, storage and marketing: at each stage of the supply chain, organic products must be kept separate from conventional ones to preserve integrity and traceability.

2.1.3 Labelling and use of "organic" claims

Under the regulation, only products that comply with the rules may use the terms listed in Annex IV on labels, in advertising, or commercial documents.[8] For instance, "bio", "organic", "eco" (or equivalents in any EU language).

For products that meet the requirements, the producer may use the official EU organic logo (Figure 1). Use of this logo ensures harmonised recognition across the EU, simplifying cross-border trade and enhancing consumer trust.

Figure 1: EU-Bio-Label.

2.1.4 Certification, controls and trade regime

To market products as "organic", producers must be inspected and certified under a control system defined by the regulation. This covers all relevant stages: production, processing, storage, import/export, transport, and trade.[9]

The regulation aims to create a level playing field across the EU, harmonising standards for all operators and fostering transparency and consumer confidence. Moreover, as of 2025, products imported from most non-EU countries must fully comply with the EU rules (rather than rely on equivalence), thereby strengthening the integrity of imported organic products.[10]

[8]https://www.gfrs.de/fileadmin/files/eu/organic-rules-faqs_en.pdf

[9]https://www.bioagricert.org/en/certification/organic-production/european-union

[10]https://www.fibl.org/en/info-centre/news/smallholders-need-support-organic-regulation

2.1.5 Organic labelling of pet food

Since the entry into force of Regulation (EU) 2023/2419, organic labelling rules for pet food have been fully aligned with those applicable to organic food for human consumption. As of 1 May 2024, pre-packed pet food marketed as organic must comply with harmonised EU requirements, ensuring greater transparency and consistency across Member States.[11]

To carry the EU organic logo, pet food must contain at least 95% organic agricultural ingredients, certified in accordance with the EU organic production rules. The term "organic" must be clearly indicated in the ingredient list using the same font, size, and colour as the other components. While the regulation recognises the inclusion of ingredients derived from hunting or fishing, these may only be used if all other agricultural ingredients in the product are organic.[12]

The mandatory use of the EU organic logo for pre-packed organic pet food strengthens consumer trust, enabling pet owners to rely on a single, harmonised certification system. A transitional period allowed products certified under former national or private schemes to remain on the market until existing stocks were exhausted, facilitating a smooth shift to the new regulatory framework.

2.2 Implementation in Germany

2.2.1 National legal framework

In Germany, the EU regulation is implemented via national legislation. The central instrument is the Öko-Landbaugesetz (ÖLG). The ÖLG is complemented by the Öko-Kennzeichengesetz (for use of organic seals/labels), and the Öko-Landbaugesetz-Durchführungsverordnung (ÖLG-DV), which sets out detailed rules for the accreditation of control/certification bodies, admission of control staff, and control procedures.[13]

*

For organic food used in collective catering (e.g. canteens, restaurants, public kitchens), Germany recently introduced the Bio-Außer-Haus-Verpflegung-Verordnung (Bio-AHVV), which establishes rules for certification, sourcing of organic ingredients, labelling and communication of organic content for communal catering providers.

https://www.agrecogmbh.com/pages/de/aktuelles/aktuelles-fuer-verarbeiter-und-handel.php

[11]https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R2419

[12]https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=EU%20Adopts%20New%20Rules%20for%20Organic%20Pet%20Food%20_Brussels%20USEU_European%20Union_E42023-0049

[13]https://www.oekolandbau.de/bio-zertifizierung/gesetze-und-verordnungen

2.2.2 Control system and certification bodies

Germany opted for a system based on accredited private inspection bodies (control bodies), under state supervision. As of mid-2022, there are 19 state-approved inspection bodies operating nationwide under the authority of the federal states or city-states.[14]

Figure 2: German „Bio-Siegel“

Whenever a business (farm, processor, trader, importer, etc.) wants to market organic products, it enters into an inspection agreement with a recognised control body. The body performs on-site inspections to verify compliance with the EU and national organic legislation.

The 2023 revision of the ÖLG (and adoption of the ÖLG-DV) aimed to clarify and strengthen the formal allocation of control tasks between supervisory authorities (Länder) and private inspection bodies. A step welcomed by the umbrella organisation Bund Ökologische Lebensmittelwirtschaft (BÖLW), with the goal “to ensure that where organic is claimed, organic is actually delivered”.[15]

2.2.3 Labelling and logos in Germany

Products certified as organic under the EU regulation may, and for food products must bear the EU organic logo and can also bear the national “Bio-Siegel” (Figure 2). Conditions to obtain the “Bio Siegel” are the same as for the EU label. [16]

Figure 3: Different private organic German labels.

In addition, manufacturers may optionally use recognised national or private organic labels (e.g. private certification schemes) if they meet at least the EU standards (or stricter national or private standards).

Private organic labels with comparable rules to obtain certification are BioBio, Alnatura, EDEKABio and ReweBio (Figure 3). [17]

[14]https://www.bmleh.de/EN/topics/farming/organic-farming/control-organic-farming.html

[15]https://www.boelw.de/presse/meldungen/artikel/oeko-landbaugesetz-weiterentwicklung-staerkt-bio-kontrollsystem

[16]https://www.umweltbundesamt.de/en/topics/agriculture/toward-ecofriendly-farming/organic-farming

[17] https://www.bund.net/massentierhaltung/haltungskennzeichnung/bio-siegel/

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Organic labels with stricter rules to obtain certification are Naturland, Demeter, Ecoland, EcoVin, Bioland, biokreis, BioPark and Gäe e.V. (Figure 3).

The national legislation provides for the legal protection of organic claims: misuse of "bio","eco" or use of related seals without compliance may be sanctioned under the Öko-Kennzeichengesetz.

2.2.4 Steps to obtain EU organic certification in Germany

Operators in Germany (farmers, processors, traders, importers) who wish to market products under the EU-organic label must undergo a certification process under the legal framework established by Regulation (EU) 2018/848.[18]

1. **Selection of a control body:** The operator must contract a recognised and accredited "control body" (private or public) that is authorised to perform inspections and issue organic certificates under the EU regulation.
2. **Application and audit agreement**: The operator submits an application, followed by a certification agreement with the control body. The control body verifies that the operator's production/processing/trade setup is eligible for certification.
3. **Inspection and compliance verification:** The control body inspects (on-site) all relevant stages; cultivation/production (including "seed/seedling" sources), processing, storage and trade, to confirm compliance with organic rules (e.g. no forbidden inputs, separation of organic vs conventional products, record-keeping and traceability). In some instances, also social aspects (adherence to proper wages, insurance) are included.
4. **Issuance of certificate and use of the EU-Bio-logo:** Upon successful audit and compliance, the control body issues an organic certificate. From then on, certified products may carry the EU-Bio-Label, the mandatory symbol for pre-packed organic food in the EU.
5. **Ongoing compliance and annual controls (audits):** Operators remain subject to regular (at least annual) inspections to ensure continuous compliance. The certifier must monitor production, processing and trade to detect and avoid any deviations from organic standards.

Optionally, operators may additionally register for the national German Bio-Siegel, the voluntary national organic label, but only if the product already complies with the EU regulation. In addition to state certification private certification can be applied for.

[18] https://germany.controlunion.com/en/certification-program/eu-organic-certification

2.3 Implementation in Sweden

2.3.1 National framework and control structure

In Sweden, the implementation of organic production standards is aligned with the European Union (EU) organic regulation, with no additional statutory requirements beyond the EU framework. The Swedish approach ensures consistent production, processing, and labelling of organic products. This alignment simplifies compliance for operators and facilitates trade within the EU single market.[19]

The national authorities responsible for organic production oversight are divided according to sectoral responsibilities. The Swedish Board of Agriculture (Jordbruksverket) oversees agricultural production, including the cultivation of crops and livestock, as well as the import of agricultural inputs such as organic feed. The Swedish National Food Agency (Livsmedelsverket) is responsible for the processing of organic products, the import of processed organic goods, and market surveillance to ensure proper labelling and compliance. These authorities work in close coordination with private inspection bodies to maintain regulatory integrity and consumer confidence.

2.3.2 Control system and certification bodies

Inspections and certification of organic operators in Sweden are carried out by private, accredited inspection bodies. These certification bodies are responsible for evaluating farms and processing facilities against EU organic standards, performing annual inspections, and verifying production records. They ensure that operators comply with the regulatory requirements throughout the production chain, from farm to market. This control system is complemented by risk-based audits and spot checks conducted by national authorities, which help maintain the credibility and reliability of organic labelling in Sweden. Several certification bodies are accredited to operate in Sweden, providing operators with multiple options for organic certification.

2.3.3 Voluntary private labels: KRAV

In addition to the EU organic logo, a significant proportion of Swedish organic products carry the KRAV label. KRAV is a voluntary, private certification standard that builds upon the EU organic baseline but extends it with additional criteria related to environmental sustainability, animal welfare, and social responsibility. Products imported into Sweden that seek KRAV

Figure 4: KRAV-label

[19]https://www.livsmedelsverket.se/foretagande-regler-kontroll/regler-for-livsmedelsforetag/kontroll-och-markning-av-ekologisk-mat

certification must be certified, or re-certified, by one of the approved certification bodies recognised by KRAV. This dual-labelling system, combining the EU organic logo and the KRAV label, reflects strong market demand in Sweden for higher ecological and sustainability guarantees than those mandated at the EU level, offering consumers additional assurance regarding the production and sourcing of organic products.[20,21,22]

2.3.4 Steps to obtain EU organic certification in Sweden

In Sweden, the regulatory implementation of the EU organic framework has been completed, and producers, processors or importers who wish to market organic products follow the same basic procedure as elsewhere in the EU, aligned with Regulation (EU) 2018/848.

1. **Engagement of an approved control body:** The operator must engage a certified control body recognised under the EU organic regulation to carry out inspections and issue certification.
2. **Application and audit arrangement:** Upon application and agreement, the control body conducts a comprehensive review of production, processing, storage and/or trade operations to ascertain eligibility for organic certification.
3. **Inspection and verification of compliance:** The control body performs on-site audits and checks all relevant aspects (inputs, processing methods, segregation, traceability) to ensure conformity with organic standards.
4. **Issuance of certificate and labelling:** Once all requirements are met, the operator receives an organic certificate. Products may then be sold under the EU-Bio-Logo for the Swedish (and broader EU) market.
5. **Ongoing controls and regular audits:** Organic operators in Sweden remain subject to regular inspections (at least once per year) by the control bodies to ensure continued compliance.
6. ***Optional additional certification (private standard):*** Many Swedish operators choose to pursue additional certification under the private KRAV-label, a national, private standard that complements the EU regulation by adding criteria (e.g. enhanced sustainability, animal welfare, social responsibility). The KRAV certification requires that the product already meets the EU organic requirements, and undergoes a separate, independent inspection

Thus, the path to EU organic labelling in Sweden is structurally similar to other Member States, with the possibility for further voluntary certification to meet higher or additional private-standard expectations.

[20] https://search.swedac.se/en/accreditations/1913/a003181-001

[21] https://www.krav.se/en/this-is-krav/a-label-for-organic-food

[22] https://www.fibl.org/fileadmin/documents/shop/1558-organic-market.pdf

2.4 Implementation in Denmark

2.4.1 National framework and control structure

Denmark has fully implemented the EU organic legislation, ensuring that domestic organic production is aligned with the EU framework. National law, primarily the Danish Organic Law, together with additional national regulations, complements the EU regulation by addressing aspects not fully covered at the EU level.

The national authorities responsible for oversight of organic production are divided according to sectoral responsibilities. The Danish Agricultural Agency (Landbrugsstyrelsen) is responsible for inspection and supervision of farms, as well as suppliers of organic feed, seeds, and fertilisers. The Danish Veterinary and Food Administration (Fødevarestyrelsen) oversees the inspection of organic food companies, including processing, packaging, and marketing activities. Both authorities work closely to ensure compliance with organic standards, safeguarding the integrity of organic products throughout the production and supply chain.

2.4.2 Control system and certification bodies

Inspections are conducted by accredited private certification bodies as well as by the national competent authorities, following the EU organic regulation. These bodies are responsible for evaluating farms, processors, and suppliers, performing annual audits, and verifying compliance with both EU and Danish organic standards. The system includes risk-based inspections and follow-up controls to maintain high levels of integrity and consumer trust. Certification bodies also authorize the use of the national Ø-logo (Figure 4) on products that meet Denmark's inspection and processing requirements.

The Danish control authorities conduct regular inspections in line with EU organic rules. Serious infringements, such as the mislabeling of non-organic products as organic, can be reported to law enforcement, while repeated or severe violations may result in disqualification from the organic market for up to five years. Less severe breaches may lead to administrative fines or the prohibition of specific products. Denmark places strong emphasis on transparency: enforcement actions are publicly announced online, both to deter malpractice and to preserve consumer confidence in the organic label.

2.4.3 Certification, labelling, and the Danish Ø-logo

Denmark has a state-controlled national organic label, the Ø-logo, which indicates that a product has been processed or packaged in Denmark under an approved inspection system. While pre-packed organic products must display the EU organic logo, the Ø-logo is commonly used to signal compliance with Danish inspection standards. It can appear on products of Danish origin as well as on imported products processed or packaged in Denmark, provided all inspection requirements are fulfilled.

Figure 5: Danish Ø-logo.

2.4.4 Steps to obtain EU organic certification in Denmark

In Denmark, operators seeking to sell products under the EU-organic label must likewise comply with the EU's organic regulation framework (Regulation (EU) 2018/848). The certification and control system is implemented via accredited control bodies or competent national authorities.

1. **Selection and engagement of accredited control body or authority:** The operator applies to a recognised control body (private or public) or authority accredited under EU regulation to conduct organic certification.
2. **Certification agreement and application:** After application, the operator concludes an agreement specifying the scope (production, processing, import, trade) to be certified.
3. **Inspection and conformity audit:** The control body audits all relevant operations; agricultural production or processing, storage, trade, verifying compliance with organic standards (no prohibited inputs, proper separation, traceability, record-keeping, environment and animal-welfare criteria).
4. **Issuance of certificate and use of EU logo:** Upon successful completion, the operator receives an organic certificate, enabling use of the EU-Bio-Logo on eligible products.
5. **Ongoing controls and compliance monitoring:** Certified operators remain subject to periodic inspections (at least annually) to ensure that organic standards continue to be met across the supply chain. The national competent authority supervises the control bodies to guarantee consistency.

In addition, when production, processing or packaging occurs in Denmark, operators may, but are not obliged to, also use a national organic label, commonly referred to in Danish markets. However, the EU-Bio-Logo remains the central, mandatory symbol for certified organic products in pre-packed form.

3. ASC: A LOOK INTO THE AQUACULTURE STEWARDSHIP COUNCIL

3.1 What is ASC?

Established in 2009, the Aquaculture Stewardship Council (ASC) is an international certification program for fish, shellfish and seaweed farming[23]. It sets strict global standards regarding the traceability throughout the whole supply chain of seafood products. ASC-certified aquacultures demonstrably must contribute to the protection of their farm's nearby environment[24]. More specifically, regarding the environment, farms have to prove to actively reduce undesired negative effects on the environment and biodiversity. This also encompasses a responsible handling of fish stock and natural resources like water. Socially, farms have to offer a good and stable workplace in compliance with core labour standards of the International Labour Organisation (ILO), while also considering local residents and surrounding communities[25].

The ASC follows strict international guidelines regarding certification programs, e.g. those of the Food and Agriculture Organisation of the United Nations and the Code of Good Practice (ISEAL)[25].

3.2 ASC standards for mussels

Regarding mussel farms, the ASC provides specific guidelines, namely:

- Certified farms must reduce undesired effects on local ecosystems in many ways and prove in management plans that the environment is not negatively affected. Farms are further forbidden to cultivate in ecologically valuable areas.
- Farms need to prove that organic waste does not form excessive sludge below the culture area by regularly measuring bottom sulfite content, which needs to lie within a fixed range.
- Measures to reduce the outbreak of diseases as much as possible. The use of pesticides and chemicals harmful to humans or the marine environment is forbidden. Measures for disease prevention are not allowed to have negative effects on endangered species or vital habitats.
- Certified farms using "young mussels" from natural banks must prove that natural stocks are preserved.

[23] https://www.kiwa.com/de/en-de/services/certification/asc-chain-of-custody-certification/

[24] https://de.asc-aqua.org/fisch-und-meeresfruechte-sorgfaeltig-gezuechtet/

[25] https://de.asc-aqua.org/zuchtstandards/

- Certification encompasses strict regulations based on the core labor standards of the ILO, forbidding any form of child or slave labor. All certified farms provide a save work environment where employees have regulated working hours and are paid appropriately[26].

3.3 How to get ASC-certified

The ASC uses a third-party certification system, meaning that certification of feed mills and farms is done by independent Conformity Assessment Bodies (CAB). Auditors perform on-site visits to farms and mills to verify whether the requirements of the specific ASC-standard are met and eligible for certification[27].

Specific steps for ASC-certification are as follows (a detailed form can be found on the ASC homepage):

1. Identify which ASC species standard applies to the farm or product and the specific requirements (see above for mussels).
2. Conduct a self-assessment against the ASC criteria, gather documentation, e.g. on water quality data and worker contracts. If needed, adjust farm practices to comply.
3. Select an Accreditation Services International (ASI) approved independent CAB, and request a proposal (it is recommended to request this from more than one certifier).
4. The chosen CAB performs an on-site visit for inspection, interviews, and to assess compliance with ASC environmental and social standards.
5. A public draft audit report is published by the CAB online for a 10-day period, allowing NGOs, local communities and stakeholders to indicate interest and provide feedback.
6. The CAB reviews comments and addresses any non-conformities before making a final decision and sending the final certification report and certificate to ASC, which then publishes both.
7. To maintain certification, the farm undergoes annual inspection audits to confirm ongoing compliance[27].

3.4 Difference between ASC and organic certification

As the ASC resulted from negotiation processes between many stakeholders, it is a compromise solution, as it tries to bridge the gap between the call for cheap production from many producers on one side and environmental protection on the other side. Hence, it is not a “premium” label guaranteeing high and strict organic standards like the Naturland certificate for aquatic organisms[28].

[26] https://de.asc-aqua.org/zuchtstandards/muscheln/

[27] https://de.asc-aqua.org/asc-zertifizierung-fuer-zuechter/

[28]https://www.wwf.de/themen-projekte/meere-kuesten/fischerei/nachhaltige-fischerei/asc-fischzucht

ASC standards for shellfish farming are still considered sustainable; however, this does not always seems to be the case for fish, especially not the ASC Salmon Standard.[29]

When directly comparing the standards of ASC, EU organic aquaculture, Naturland aquaculture and KRAV aquaculture, it becomes clear that ASC has the least strict rules with the most room for interpretation and leeway. On the other end stands Naturland, having the strictest standards with clear rules.

Table 1. Differences between ASC, EU organic, Naturland and KRAV certifications.

	ASC	EU organic	Naturland	KRAV
Antibiotics	Permitted only if prescribed by vet; record-keeping of use; limits on frequency	Only if absolutely necessary and vet-prescribed; not prophylactic; strict annual treatment limits	Use of antibiotics forbidden	Same as EU; no preventative use
Parasites	Non-chemical preferred; chemical allowed under strict conditions; monitor/ report impact	Non-chemical preferred; chemical only if needed and if vet-prescribed	Use of chemicals not allowed	Same as EU; focuses on prevention
Feed	Responsibly sourced fishmeal/ oil (e.g. MSC); limited soy; use astaxanthin	Plant content organic, aquatic content organic aquaculture/certified sustainable fisheries (EU Regulation); no synthetic pigments	Organic plant feed and fishmeal/oil (industrial fish waste); GMO-free; natural pigments (yeasts, algae)	Organic feed required; preference for local sources
Environment	Detailed water & sediment monitoring; effluent limits; site criteria	Environmental impact assessment before licensing; control nutrient discharges	Strict biodiversity measures mandatory; habitat protection; environmental plan & regular impact assessments	Strong requirements for site choice & biodiversity protection; environmental monitoring

[29] https://www.seachoice.org/our-work/eco-labels/whats-behind-the-label-report/

Stock density	Higher than orga-nic; e.g. salmon ≤ 25kg/ m³	Lower densities; e.g. salmon ≤ 10kg/ m³	Same as EU; low densities to improve welfare	Similar to EU; low densities to improve welfare
Social	Detailed worker rights, health & safety; ILO	Basic worker safety provisions; regulated at national level	Strong social & fair-trade principles	KRAV social criteria: fair conditions, worker safety, human rights
Material/ Cleaning	Minimize environmental impact; stress need for responsible sourcing, management of equipment & waste disposal; mandatory fallowing; cleaning protocols	Materials that avoid harmful leaching; durability, recyclability & responsible disposal suggested; only authorized equipment/ substances for cleaning; fallowing required between cycles	Decomposable materials where possible; use of PVC forbidden; recycling recom-mended; renew-able energy re-sources preferred; materials not harmful to orga-nisms/ environ-ment; recording of used materials annually; fallo-wing required between cycles	Similar to Naturland
	30 31 32	33	34 35	36

[30] https://programme-centre.asc-aqua.org/farm-v1/farm-standard/

[31] https://asc-aqua.org/blog/how-does-salmon-get-its-colour/

[32] https://asc-aqua.org/producers/asc-standards/feed-standard/responsible-feed-integral-to-seafood-farmings-future/

[33] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32018R0848

[34] https://www.naturland.de/images/01_naturland/_en/Standards/Naturland-Standards_Aquaculture.pdf

[35] https://www.naturland.de/images/01_naturland/documents/Faktenchecks/Faktencheck-Tierwohl-Lachs-Forelle.pdf

[36] https://wwwkravse.cdn.triggerfish.cloud/uploads/sites/2/2023/12/krav-standards2024-25-1702048556.pdf

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4. GENERAL LABELLING REQUIREMENTS FOR PET FOOD IN GERMANY, SWEDEN, DENMARK AND THE EUROPEAN UNION

The placement on the market and sale of pet food in Germany, Sweden and Denmark is subject to a defined legal framework derived from European Union (EU) feed law, which sets out detailed requirements on what must appear on product labels, who regulates these requirements, and how compliance is enforced. Pet food is regulated as a category of feed intended for non-food-producing animals rather than human food products, and it is treated accordingly in both EU and national law.

4.1 Regulatory framework and competent authorities

At the EU level, the principal legal instrument governing the labelling of pet food is Regulation (EC) No. 767/2009 on the placing on the market and use of feed. This regulation applies to all animal feed, including pet food, and sets out the mandatory particulars that must accompany products offered for sale within the EU single market. The text of this regulation and its requirements are directly applicable in all Member States without separate national implementation[37].

In addition to the general feed labelling regime, a specific EU regulation on the labelling of organic pet food was adopted in 2023. Regulation (EU) 2023/2419[38] of the European Parliament and of the Council on the labelling of organic pet food introduces harmonised requirements on how organic claims may be made on pet food products and when the EU organic logo may be used (see chapter 2).

Within Germany, enforcement of these EU requirements is carried out by the Federal Office of Consumer Protection and Food Safety (Bundesamt für Verbraucherschutz und Lebensmittelsicherheit, BVL) and by local veterinary and food control authorities (Veterinärämter and Lebensmittelüberwachung) that inspect feed businesses and retail points to ensure compliance with labelling and safety provisions. Authoritative guidance is available on the BVL website and associated feed labelling guidelines.

In Sweden, the Swedish Board of Agriculture (Statens jordbruksverk[39]) is the competent authority for feed and pet food placed on the Swedish market. Feed products including pet food must be labelled in accordance with EU labelling regulations and in Swedish when sold in Sweden. The Board also enforces registration requirements for feed business operators and ensures traceability and safety of feed products on the Swedish market

[37] https://eur-lex.europa.eu/eli/reg/2009/767/2018-12-26/eng

[38] https://eur-lex.europa.eu/eli/reg/2023/2419/oj/eng

[39] https://jordbruksverket.se/languages/english/swedish-board-of-agriculture/animals/feed-and-animal-products/trade-with-feed-with-countries-outside-and-in-the-eu

In Denmark, the Danish Veterinary, Food, Agriculture and Fisheries Agency (DVFA[40]) enforces the EU feed and labelling requirements under national feed legislation. The DVFA oversees compliance with Regulation (EC) No. 767/2009 and Danish implementing provisions, including checking that labels are correct and in Danish where required. (There is not a separate Danish pet food law; EU feed law applies directly, and feed sold in Denmark must be labelled in Danish.)

4.2 Mandatory label content under EU feed law

Under Regulation (EC) No. 767/2009[41], pet food labels must include specific information to ensure transparency for purchasers and to maintain traceability and safety in the feed chain. These mandatory particulars must be displayed clearly, prominently, legibly, and indelibly on the packaging, container or accompanying documents, and in the official language of the Member State where the product is marketed.[42] Hence, for Germany Sweden and Denmark the language requirement means that all mandatory label particulars must appear at least in the national language (German in Germany, Swedish in Sweden and Danish in Denmark) when the product is sold in those markets.

The main required label elements are:

- **Feed designation and type**: Pet food must be identified by its name and whether it is complete feed, complementary feed or another recognized category of feed.
- **Intended species or animal category**: Labels must clearly indicate the animal species for which the product is intended (e.g., dog, cat).
- **List of ingredients (composition)**: All ingredients must be listed in descending order by weight, using standard feed material names.
- **Additives and functional classes**: Feed additives must be declared together with their functional class (e.g., vitamins, preservatives).
- **Analytical constituents**: Key nutritional components, such as crude protein, fat, fiber, and ash, must be shown under an “Analytical constituent” heading for compound feeds.
- **Net quantity**: The net weight or volume of the product must be stated.
- **Name and address of responsible operator**: The feed business operator responsible for the product must be identified by business name and address.

[40] https://en.foedevarestyrelsen.dk/food/nutrition-and-health/nutrition-and-labelling

[41] https://eur-lex.europa.eu/eli/reg/2009/767/2018-12-26/eng

[42] https://q-s.de/services/files/downloadcenter/j-fleischwirtschaft/2026/leitfaden/deutsch/Leitfaden_Heimtierfutter_01_01.2026.pdf

- **Batch or lot number**: A batch identifier must be provided for traceability.
- **Feeding instructions and usage**: Where appropriate, instructions for proper use (e.g., feeding guidelines) should be given.
- **Free contact method**: For pet food specifically, a free telephone number or other appropriate means of communication must be provided so that purchasers can obtain additional information on the feed additives contained and categories of feed materials used in the product.

These label requirements apply uniformly across Germany, Sweden and Denmark as part of the single EU market. They ensure that consumers and users of pet food have adequate information to understand what the product contains, how to use it, and whom to contact for further details.

4.4 Presentation, language, and other tractical considerations

Mandatory particulars must be presented in a way that is not misleading or obscured, with text that is legible and easily identifiable on the packaging or through accompanying documentation (especially in the case of bulk or online sales). The prescribed content must be complete, and information should be provided in the national language(s) of the Member State where the product is sold (German/Swedish/Danish).

For pet food sold through distance selling channels (e.g. online), the full labelling information must be accessible at the point of purchase, and specific provisions allow that accompanying documents, such as invoices, may be used to provide complete labelling information for bulk goods and some non-prepacked products.

4.5 Nutritional labels and health claims

Mandatory nutrient declarations under Regulation (EC) No 767/2009[43] (e.g., crude protein, fat) are distinct from voluntary nutrition or health claims. Feed labels may highlight composition or nutrient content, but any function claim (even about digestive health or coat condition) must be verifiable and non-misleading under feed law and general consumer protection[44].

Manufacturers cannot automatically apply the EU food health claims regime (Regulation (EC) No 1924/2006) to pet food; however, its principles (truthfulness, scientific substantiation) influence how similar claims are interpreted by enforcement authorities[45].

[43] https://eur-lex.europa.eu/eli/reg/2009/767/oj/eng

[44] https://fefana.org/tools/eu-code-of-practice-on-claims

[45] https://food.ec.europa.eu/food-safety/animal-feed_en

The European Pet Food Industry Federation (FEDIAF[46]) publishes Codes of Good Labelling Practice and nutritional guidelines which industry uses to align voluntary claims with legal requirements and to ensure consistency across EU markets.

In practice:

- Claims about preventing, treating, or curing disease in animals are prohibited unless explicitly permitted by EU feed law.
- Claims that a feed has a "particular nutritional purpose" or delivers special effects must be justified under the regulatory framework for dietetic feed (Regulation (EU) 2020/354 and related implementing texts).

Within Germany Sweden and Denmark nutritional and health claim fall under the pet feed regulation (EC) No 767/2009 and no specific national regulations exist. Hence, adherence to rules is also enforces through the national authorities that look into adherence to labeling (see chapter 4.1)

4. CONCLUSION

Organic certification under the EU framework, supported by national authorities and accredited control bodies, ensures consistent standards for environmentally responsible and traceable production, whether in crop, livestock, or aquaculture systems. National adaptations in Germany, Sweden, and Denmark illustrate how EU rules are operationalised while accommodating additional voluntary or private standards, reflecting market demands and local priorities. Complementary initiatives, such as ASC certification, provide further sector-specific guidance, particularly in aquaculture, emphasising environmental management and social responsibility. Together, these certification systems create a multi-layered approach to sustainability, enabling producers to demonstrate compliance, enhancing consumer confidence, and fostering trust in the integrity of organic and responsibly farmed products across the European market, while general and in particular, specific labelling prerequisites for organic feeds further support customer trust.

[46] https://europeanpetfood.org/self-regulation/nutritional-guidelines