

IFOAM EU Group position/amendments regards Commission document on organic wine making rev3, SCOF 14 and 15 December 2009

December 11, 2009

Working document rev3, SCOF 14 and 15 December 2009		IFOAM EU Group amendments proposals
Recital (7)	[...] This applies to the concentration by cooling, the dealcoholisation, the elimination of sulphur dioxide by physical process, [...]	[...] This applies to the concentration by cooling, the dealcoholisation, the elimination of sulphur dioxide by physical process, (except for concentrated rectified must) , [...]
Art 29d point 1.c:	[For heat treatments according to point 2 of Annex IA to Regulation (EC) No 606/2009, the temperature shall not exceed 65°C.]	[For heat treatments according to point 2 of Annex IA to Regulation (EC) No 606/2009, the temperature shall not exceed 65°C for grapes treatment.] Heat treatment for the production of specialities (like balsamic vinegar) and flash pasteurization are allowed with no temperature limitation. <i>IFOAM EU comment: There are some specialities whose production methods require heat treatment(s) at over 65 degrees C. These should be established and recognised by the Commission, and given special considerations. Balsamic vinegar is a well-known speciality for which high-temperature treatment is required during production, and it should be excluded from heat treatment temperature limitations.</i>
Art 29d point 3:	The use of the following practices shall be re-examined before 31 December 2013 with a view to phase out or to further restrict these practices.	The use of the following practices shall be re-examined before 31 December 2013 2015 with a view to phase out or to further restrict these practices.
Art 29.3 b.	Ion exchange resins according to point 20 of Annex IA of Regulation (EC) No 606/2009	Ion exchange resins according to point 20 of Annex IA of Regulation (EC) No 606/2009 <i>IFOAM EU comment: This technique have to be allowed ONLY to make rectified concentrated musts, without any time limitation. As regulation 606/2009 clarify use restriction for the rectified concentrated must, it should be deleted from the list of banned techniques.</i>

Art. 29 d point 4b.	b) Elimination of sulphur dioxide by physical processes according to point 8 of Annex IA to Regulation (EC) No 606/2009;	b) Elimination of sulphur dioxide by physical processes according to point 8 of Annex IA to Regulation (EC) No 606/2009; <i>IFOAM EU comment: This technique should be allowed ONLY for the production of concentrated and rectified musts. It should be included as a new point (3c) in the Article 29d point 3. This technique should be allowed until 2015 and then re-evaluated</i>
New Art 29d point 3c:		c) Elimination of sulphur dioxide by physical processes according to point 8 of Annex IA to Regulation (EC) No 606/2009 may be used only for the production of concentrated and rectified grape musts. <i>IFOAM EU comment: This technique should be allowed until 2015 and then re-evaluated. This technique should be allowed ONLY for the production of concentrated and rectified musts. The only practical way to prevent fermentation of musts is use of SO₂, but then SO₂ should be partially removed before the concentration and rectification of grape musts. There are small experiences on low temperature use for prevention of must fermentation as an alternative to physical elimination of sulphur dioxide, but this still needs more research.</i>
Art 29d point 4c:	Electrodialysis treatment to ensure the tartaric stabilisation of wine according to point 36 of Annex IA to Regulation (EC) No 606/2009;	Electrodialysis treatment to ensure the tartaric stabilisation of wine according to point 36 of Annex IA to Regulation (EC) No 606/2009; <i>IFOAM EU comment: This technique should be allowed until 2015 and then re-evaluated. It should be included as a new point (3d) in the Article 29d point 3.</i>
New Art 29d point 3d:		d) Electrodialysis treatment to ensure the tartaric stabilisation of wine according to point 36 of Annex IA to Regulation (EC) No 606/2009; <i>IFOAM EU comment: This technique should be allowed until 2015 and then re-evaluated.</i>

Annex VIIIa <i>Points 5, 15 and 21: Use</i>	- Yeasts*	- Yeasts* - Yeast cell walls* - Yeast mannoproteins* - Fresh lees*
Annex VIIIa <i>Point 10: Clarification</i>	- Edible gelatine* - Plant proteins from wheat or peas* - Isinglass* - Egg white albumin* - Tannins* - Casein - Potassium caseinate - Silicon dioxide - Bentonite - Pectolytic enzymes	- Edible gelatine* - Plant proteins from wheat or peas* - Isinglass* - Egg white albumin* - Tannins* - Casein - Potassium caseinate - Silicon dioxide - Bentonite - Pectolytic enzymes - Beta-glucanase
Annex VIIIa <i>Point 12: Use Acidification</i>	- Lactic acid - L(+)Tartaric acid	-Lactic acid - L(+)Tartaric acid
Annex VIIIa <i>Point 31: Use</i>	- Cupric acid	-Cupric acid - Cupric citrate
Annex VIIIa Type of treatment in accordance with Annex III, point 2(b) to Regulation (EC) No 606/2009	Calcium sulphate	Calcium sulphate (Allowed only for only for special Spanish wines according Regulation EC 606/2009. It is use in organic production to be evaluated in 2015.)
Annex VIIIa <i>Aterix under the table</i>	*) derived from organic raw material by preference	*) derived from organic raw material by preference and to be evaluated in 2015

	<p align="center">Working document rev3, SCOF 14 and 15 December 2009</p>	<p align="center">IFOAM EU Group comments</p>
<p>Recital (9)</p>	<p>When such conditions are met, provision should be laid down to allow sulphur dioxide content up to the maximum levels fixed by Regulation (EC) No 606/2009.</p>	<p><i>There is a lack of clarity regarding the procedure by which Member States or the Commission (on request of Member States) are to evaluate the meeting of these conditions. IFOAM EU Group requests that a standardized, transparent procedure be proposed by the European Commission, to which it will provide feedback.</i></p>
<p>Annex VIIIa</p>		<p><i>It is difficult to read this annex as it refers to Regulation EC 606/2009 for each products or substance. As use of certain products and substances is limited within Regulation 606/2009, the first impression is that this organic regulation allowed some additives which are not allowed by the general regulation on wine. It might be useful to repeat comments in the case of certain products and substances after Regulation EC 606/2009. It would be practical in the case of following products and substances:</i></p> <ul style="list-style-type: none"> - <i>Aleppo pine resin</i> - <i>Calcium sulphate</i>