



## ***Working for organic farming in Europe***

International Federation of  
Organic Agriculture Movements –  
EU Regional Group

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Isabelle PEUTZ  
Head of Unit  
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Brussels, 18 April 2007

Dear Isabelle,

### ***Implementing rules to replace Annex VI***

I am writing with some comments and suggestions for the implementing rules that will replace Annex VI in the proposed new organic regulation. These recognise that the changes in this new regulation will necessitate some amendment to the existing Annex VI, even though the main contents will remain more or less unchanged.

### ***Removal of “ingredients of non-agricultural origin”***

We very much welcome that the description “ingredients of non-agricultural origin” has not been transferred to the revision proposal. It is important, both for consistency, and for the scope of what needs to be covered that this change is reflected in the rules that replace Annex VI.

Following from the above, we propose that the heading of the former Annex VI A can reflect the categories specified Article 14 1 b), namely:  
*“Substances as referred in article 14 1. B (additives, flavourings, water, salt, preparations of micro organisms and enzymes, minerals, trace elements, vitamins, amino acids and other micro nutrients)”*

An important consequence of this is that it recognises some of these technical substances are of agricultural origin. Therefore they can be certified as organic, which of course should be encouraged. From our understanding of the latest draft of the revision proposal, this means such substances would have to be processed from raw materials of organic agriculture in accordance with all requirements of the regulation.

Similarly, the heading of the former Annex VI B should read:

*“Processing aids, Ion exchange and adsorbent resins and other products which may be used for processing of ingredients from organic production, referred to...”*

We have drawn your attention to the necessity to explicitly add to the heading “Ion exchange and adsorbent resins” several times before. Of course there will need to be the appropriate evaluation of acceptable applications for these substances.

### *Calculation of organic content*

We have previously pointed out that we see a problem with the percentage calculation of organic content as referred to in Article 17.4. It is not clear exactly what should and should not be included, especially given that some technical ingredients may be derived from organic origin. In order to avoid these uncertainties in practice, we urge that this gap be closed in the new implementing rules.

We suggest that **all ingredients**, with exception of water and cooking salt, should be part of the calculation, as in Article 14.1.a. This would mean adding in the relevant part of the implementing rules a sentence which clarifies the calculation system of ingredients. We feel this would be the best approach, as it is not clear which ingredients should be included and which excluded in the various calculations.

We would like to emphasise that the calculation system we have proposed above is consistent with all the major world-leading organic standards, in particular Codex Alimentarius Guidelines, IFOAM Norms and the USDA NOP. For the EU to also adopt this would therefore be an important contribution towards international harmonisation. Further, we feel it would provide a clearer communication for consumers.

### *Substances for nutritional purposes*

The proposed revision of the regulation includes a new concept regarding substances for nutritional purposes. Article 6.b reads "*restricting the use of ... micronutrients ...are used to a minimum extent ... for special nutritional purposes*". We welcome this, but we are concerned that the basic position could be abused. We therefore propose some revisions of the former Appendix VI.A.5 for the new implementing rules.

1. The addition of micronutrients (minerals including trace elements, vitamins, amino acids, other nitrogen compounds and lipids) in organic foods should be restricted to clearly defined products such as dietetic food (Directive 89/389 Article 2) or food supplements (Directive 2002/46 Article 2).
2. Such micronutrients should be evaluated individually and listed in a positive list which defines both the substance and the product group in which it is allowed. Further, the micronutrients added to organic food may be used only for the dietetic purpose of the dietetic food. (eg for organic diabetic products, it could be allowed to add sorbite as sugar substitute, but Vitamin C does not correspond to this particular dietetic purpose).
3. For baby food, since these have to be manufactured scientifically correctly, as pointed out several times by the IFOAM EU Group, the micronutrients as referred to in the positive list appendices of directive 2006/141 should be accepted for the production of organic baby foods. These appendices cover the legally required and the permitted substances. Both categories should be



accepted in general by making a reference to the positive lists of directive 2006/141.

*Organic yeast*

Article 14a of the proposed new organic regulation defines general rules for the production of organically produced yeast. We propose that further elaboration is based on existing private standards for yeast production, as these are established in different European countries by private organisations. Please find enclosed one example of this. We assume the more detailed production rules for organic yeast could be part of the implementing rules. We ask therefore to base these on the attached annex.

We hope you will find these suggestions and proposals helpful and we are ready at any time for further discussions at your disposal.

With best wishes  
Yours sincerely

A handwritten signature in black ink, appearing to read "Francis Blake". The signature is written in a cursive style with a horizontal line underneath the name.

Francis Blake  
President

## *Annex I*

### *Scope*

These standards are valid for yeast and yeast products (e.g. baking yeast, nutrient yeast, yeast extract)

### *Ingredients of agricultural origin*

Carbon and nitrogen sources from organic raw materials processed physically or biologically.

### *Other Ingredients*

#### *Flavour*

It is not permitted to use flavours.

#### *Water and salt*

- Water, at least corresponding to the drinking water decree
- Sea salt, table salt (preferably common salt), also iodized, best possible without any addition of expedients for tackling (only calcium carbonate (E 170) and magnesium carbonate (E 504) are permissible for tackling expedients)

#### *Cultures of microorganism and enzymes*

- Cultures of microorganism and autolysat which – as far as available – are increased on ecological substratum; the share of conventionally produced yeast at final product must not exceed max. 5%
- Enzymes (for digesting organic carbon and nitrogen sources)

#### *Foodstuff additives*

- Calcium carbonate (E170) for control of pH-Value
- Lecithin (E 322) (only from ecologically produced raw materials)
- Citric acid (E 330) for control of pH-value

#### *Processing aids*

- Filter materials like fabric-, paper or cellulose filter as well as filter expedients from ecological production (e.g. potato starch)
- Carbon dioxide (CO<sub>2</sub>), nitrogen (N<sub>2</sub>)
- Skimming agents from ecological production (e.g. vegetable oils)
- Sea salt, table salt (preferably common salt), also iodized, best possible without any addition of expedients for tackling (only calcium carbonate (E 170) and magnesium carbonate (E 504) are permissible for tackling expedients)