



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

International Federation of  
Organic Agriculture Movements –  
EU Regional Group

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**President:** Christopher Stopes

### **Organic Wine Making - Sulphites**

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Dear Mr Hulot,

The EU organic wine standards are nearing completion. They will enable differentiation between organic and conventional wines and thus will allow the organic sector to communicate the added value of organic wine to consumers. The IFOAM EU Group believes that the most important characteristic of organic wine remains the use of organically produced grapes. Other key features of organic wine include the prohibition of a range of processing aids and production techniques for organic wine making and the requirement to use ingredients of organic origin wherever possible. The IFOAM EU Group has communicated these positions to you and SCOF.

However, the issue of sulphite reduction remains controversial among member states. We fully acknowledge the importance of the ORWINE project, which provided valuable insight into the range of positions on sulphite reduction. The IFOAM EU Group has spent a considerable amount of time discussing the issue amongst experts in organic wine and our members through representatives on our Board. As the majority of our members believe that the issue of reduction of sulphite levels is an important criteria for organic wine making we would like to comment on the issue and provide some guidance.

**I would like to draw your attention on the key points on which the IFOAM EU Group has achieved consensus regarding several important issues relating to the use of sulphite:**

1. A reduction of 50% in SO<sub>2</sub> content (as originally proposed by COM) is too high to allow organic wine production in all European wine regions even if for some regions it would be possible. We are seriously concerned that a reduction of this scale would force organic wine producers out of business.
2. A fast-track flexibility clause is necessary, e.g. for cases of exceptional climatic conditions/climatically extreme years. This flexibility must work independently of the flexibility provided by the CMO, but of course within the framework given by the CMO. It is possible, for example, that in one year organic wine production could be seriously disadvantaged with respect to conventional, as most of the pesticides in conventional wine growing are not allowed in organic production, so that relying on the CMO flexibility mechanism alone is not sufficient.
3. Sulphite level proscriptions must take into account the different types of wines of different colours and residual sugar levels, as is the case under the CMO.
4. Sulphite levels must be stated in absolute values and not as percentages.
5. There should be no requirement to indicate the level of sulphite on the label.
6. According to the annex of the working document, special wines are

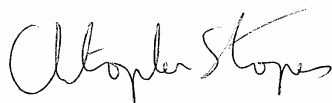
excluded from the sulphite limitations but are nonetheless allowed to be labelled as “organic wines” (“Special wines” are defined in EU Reg. 606/2009 Annex IB (2c, d and e) along with liqueur wines and sparkling wines, as being closely linked to local tradition and limited in scale of production and consumption). The IFOAM EU Group supports that these wines should not be included in any restriction of sulphite use but should respect all the other parts of the regulation in order to qualify for the “organic wine” or “organic sparkling wine” labels.

7. The double labelling (‘organic wines’, ‘wines from organically grown grapes’) would not be permitted.
8. Where a reduction in the sulphite content of organic wine is included in the final production rules adopted, the further direction shall be re-examined in 2015 (together with the other substances foreseen for re-evaluation).
9. Any reduction of sulphites should be coupled with an obligation of Member States to:
  - i. Document and report on an annual basis if a significant number of producers face severe problems despite using best practice to achieve sulphite reduction (as for example outlined in the ORWINE Code of Practice).
  - ii. Provide scientific evidence for the perceived need for a re-examination of sulphite levels.
  - iii. Establish educational/training programmes to achieve the goal of sulphite reduction.

The current COM proposal is for a reduction of 50mg/l against existing CMO norms for different wine types. This would result in a reduction of between 19 and 34% (depending on wine type). Most of the IFOAM EU Group members can support the current Commission proposal (i.e. a reduction of 50mg/l against existing CMO norms). However, we want to emphasise that members from three countries<sup>1</sup> cannot agree to the current Commission proposal and oppose any reduction in view of the challenges they face due to climatic conditions. Therefore we would like to underline again that any reduction decided on has to go hand in hand with a fast-track flexibility clause, e.g. for cases of exceptional climatic conditions/climatically extreme years. This flexibility must work independently of the flexibility provided by the CMO, but of course within the framework given by the CMO.

Please do not hesitate to contact me if you would like to discuss this further.

Best wishes

A handwritten signature in black ink that reads "Christopher Stopes". The signature is written in a cursive, flowing style.

Christopher Stopes  
President

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<sup>1</sup> Germany, Austria, Netherland do not agree to any reduction in sulphites.