



International Federation of
Organic Agriculture Movements –
EU Regional Group

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Working for organic farming in Europe

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Head of Organic Farming Unit
Directorate-General for Agriculture and Rural Development
European Commission
BE- 1049 Brussels

Dear Mr Jean-François Hulot,

For years now, there has been no substantial revision of the technical details for processing of organic foods. This is mainly relevant for the requirements given in article 27 (including Annex VIII) and Annex IX of Reg. (EC) No 889/2008.

We understand the new expert group will have the responsibility to work out proposals for amendment to the Commission regulation under proposed delegated powers. The IFOAM Group has debated the technical requirements given for organic food processing, in respect to the requirements given in Article 3 and Article 21 of Reg. (EC) No 834/2007. We find the most important task to be the protection or enhancement of the **authenticity and naturalness** of organic foods and to choose requirements which contribute to achieving consumers' trust.

We have to recognise that the legal surroundings have changed. The new regulation 1331/2008 for additives, enzymes and flavours creates a need for adaption of the organic regulation and provides a number of new regulatory challenges for the organic regulation. (See Reg. (EC) Nos. 1332/2008, 1333/2008 and 1334/2008).

Ecological responsibility

Before coming to the detailed technical requirements for processing, we would like to address this new and more general topic. We know consumers expect that organic products are produced, processed and traded in an environmentally friendly way.

In accordance with the requirements of article 3 and 4 of the EC reg. 834 we propose to introduce further requirements for the ecological performance of operation involved in organic processing and trade.

The basis for the evaluation of ecological performance of a processing and trade operation is the availability of management procedures which create relevant data on the environment performance of an operation. Therefore we propose to introduce, as a first step in the organic regulation, the requirements that an organic operation must implement an environmental management system. The system must guarantee that the company has established "an effective means to measure and evaluate its environmental performances and impacts".

These requirements should be introduced in the regulation taking into account the type and size of the processing or trade operations. The system must be efficient and should not cause too much bureaucratic burden especially on small operations.

Availability of technical ingredients in organic quality

A number of substances such as Locust bean gum, Guar Gum, Arabic Gum from Annex VIII A, Carnauba wax, from Annex VIII B, products such as microorganisms and natural flavourings components listed in Article 27 are today fully or partly available in organic quality. In order to promote the production and the use of such organic certified technical and sensorial ingredients, we propose to install a legal mechanism for the availability of organic versions of these products.

As an example a system could be developed similar to the process for seeds and propagation material (EC Reg. 834/2007 Article 22 (2) b) and EC Reg. 889/2008 Article 45), but applicable throughout the EU to record and promote the availability of these materials to encourage manufacturers to make them more widely available and encourage processors to use them.

Microorganisms

We think there is a need for further restrictions of the use of microorganisms in processing. This includes specifying more clearly the way in which cultures are used and when (at which stage) the multiplication must be done on organic substrates.

There may be a need to restrict the use of microorganism cultures, which produce substantial amounts of specific antibiotics or other substances, which might be harmful to human health or contribute to development of antibiotic resistant strains.

On the other hand we believe that organic yeast could be obligatory when available in sufficient quantity and quality. Bakers' yeast should therefore be excluded from the scope of Reg. (EC) No 889/2008 (Article 27 (1) b), at some point in the future to be decided. However we do not believe that this sector is sufficiently advanced at present.

Organic microorganism cultures should be used in other areas such as dairy and fermentation industries as they become available and technologically suitable.

Enzymes

Enzymes should be regulated in a positive list of enzymes allowed for organic products. This list should be developed in the medium term depending on when the proposed list of conventional enzymes permitted in food is published. Consultation will be needed on whether the list of permitted enzymes should contain restrictions to limit specific enzymes to specific applications in specific product groups, including feed.

Flavourings

First of all the actual requirements must be adapted to the new flavourings regulation given in Reg. (EC) No 1334/2008. This review gives the opportunity to enable and encourage the development of organic natural flavours and to enable their use to be

enforced over the next few years. In order to do so it is necessary to develop specific additional requirements for the production of these products in order to allow their market to develop appropriately.

We suggest the following requirements for organic flavours. These suggestions are a starting point and remain only one part of the approach towards food ingredients in organic food processing strategy.

- 1.) The organic flavourings must contain minimum 95% organic ingredients.
- 2.) All flavouring ingredients of organic natural flavourings referring to a named plant mentioned on the labelling of the final product must come from that plant.

For example, a lemon organic natural flavouring must contain only flavouring ingredients derived from organic lemon plants.

Composed flavourings consisting of flavour components must fulfil point 1 and the obligation in this paragraph.

- 3.) Processing of the components of an organic flavouring must follow the requirements of the regulation including the technical details given in article 27 and Annex VIII of Reg. (EC) No 889/2008.
- 4) An organic ingredient shall not be present together with the same ingredient in non organic form in an organic flavour.
- 5.) Only carriers which are organic foods (ethanol, oil, fat, maltodextrin, etc) and water and salt are accepted for the production of organic flavourings.
- 6.) Additives, solvents and processing aids can only be used for the production of organic flavours if listed in Annex VIII A or B of Reg. (EC) No 889/2008, except where available in organic form, such as organic ethanol.
- 7.) Organic flavourings should be used if available in sufficient quantity and quality. A mechanism for availability of technical ingredients in organic quality, mentioned above should apply for use with flavourings.

Smoke Flavour

We think it is important to clarify the use of pure liquid smoke flavour as previously proposed (our letter of September 14, 2009). For consumer interest, we propose that the use of liquid smoke flavour must be clearly distinguished. Use of the word “smoked” alone should only be allowed where traditional smoking, only has been used to cure or flavour the product.

Processing methods

Article 19(3) of Reg. (EC) No 834/2007, establishes the possibility to exclude processing methods from being used for the processing of organic foods. We see this as a positive step forward.

The legal instruments given in Article 19(3) should only be used if incompliance with the aims and principles of the organic regulation are found or in the case of conflicting situations. For example it should be used to clarify use of ion exchange. We expect a clarification by a clear prohibition of ion exchange methods with exceptions for specific applications. As an example of such exception the production of organic infant formula milk products with reduced mineral levels using organic ingredients treated with ion exchange can be mentioned.

The IFOAM EU Group considers that the issues relating to food processing have perhaps not received the necessary attention over the last few years and see the advent of the expert group as an opportunity to work on these issues at the correct level. We would welcome the opportunity to discuss these important issues with the European Commission so that the agenda of the expert group can be developed to best reflect the concerns and interests of the organic sector.

We hope our proposals are helpful. If questions arise please do not hesitate to contact us. We remain available for discussion and clarification at any stage.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'Marco Schlüter', is centered on a light-colored rectangular background.

Marco Schlüter
IFOAM EU Group Director