



International Federation of
Organic Agriculture Movements –
EU Regional Group

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under organisation number
817606-9436

Working for organic farming in Europe

Mr Jean-François Hulot
Head of Unit, Organic Farming
European Commission
BE- 1049 Brussels

Brussels, 22 April 2010

Letter on availability of GMO free vitamin B2

Dear Mr Jean-François Hulot,

According to the agenda of the upcoming SCOF on April 26th there will be a discussion on the availability of vitamin B2 in GMO-free quality. The IFOAM EU Group would like to share its position with you:

According to Art. 9 of Regulation (EC) No 834/2007, "GMOs and products produced from or by GMOs shall not be used as food, feed, processing aids, plant protection products, fertilisers, soil conditioners, seeds, vegetative propagating material, micro-organisms and animals in organic production". Art. 2 provides the definition: "*produced by GMOs* means derived by using a GMO as the last living organism in the production process, but not containing or consisting of GMOs nor produced from GMOs." Since there is no EU labelling regime in force, the operator shall require the vendor to confirm that the products supplied have not been produced from or by GMOs.

Based on an ad hoc investigation we came to the conclusion that at least Hubei Guangji Pharmaceutical Co. Ltd. is offering vitamin B2, confirming that the product has not been produced from or by GMOs according to the definition in the Regulation (EC) No 834/2007. Please find attached confirmations of Hubei on two vitamin B2 products.

The rumour that Vitamin B2 is not available anymore in GMO-free quality might have been based on uncertainty about the definition of GMO-free in this case or might have arisen because one producer has changed its production method. Based on the clear definition provided in Art. 2 of Regulation (EC) No 834/2007 at least Hubei offers vitamin B2 products compliant with the organic regulation.

Therefore there is no need to make use of the flexibility provision given in Article 22(g) of Regulation (EC) No 834/2007. Even if there would be no vitamin B2 from these sources we would have to look for alternative sources and solutions in the first line instead of using the flexibility clause.

Kind Regards

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

Marco Schlueter
The IFOAM EU Group Director

Attachments:

- a) Declaration for RIBOFLAVIN (VITAMIN B2) BP/USP/EP produced by Hubei Guangji Pharmaceutical Co. Ltd.
- b) Declaration for RIBOFLAVIN (VITAMIN B2) 80% feed grade produced by Hubei Guangji Pharmaceutical Co. Ltd.



HUBEI GUANGJI PHARMACEUTICAL CO., LTD
Add: No.1 Jiangdi Road, Wuxue City, Hubei Province, China.
Email: info@guangjipharm.china.com
Tel: +86-713-6212649;6213445
Fax: +86-713-6212108,6212649
Zip: 435400

GMO FREE DECLARATION

PRODUCT: RIBOFLAVIN (VITAMIN B2) BP/USP/EP

We confirm that the above product

- is not produced from GMO as starting material
- does not contain GMO
- is not produced using any GM technology (GM microorganisms, enzymes or processing aids from GM microorganisms)

Date: February 24, 2010

Signature and stamp:

Wang Xiaomei

QA Manager



Contractual compliance agreement to the prohibition of genetically modified organisms as contained in the current version of Council Regulation (EC) No 834/2007

Producer: CO., LTD.
 Name: HUBEI GUANGJI PHARMACEUTICAL Tel./Fax: 86-713-6218349
 Street: NO.1 JIANGDI ROAD, WUXUE CITY, HUBEI Email: du2409@foxmail.com
 Postal code/city: 435400 Country: CHINA

We hereby confirm for the following product:

Article number	Precise product description
	<u>Vitamin B2 80% GMO Free</u>

Component	Contractual compliance given (please check)	Last organism(s) able to reproduce
<u>Riboflavin (Vitamin B2)</u>	<input checked="" type="checkbox"/>	
<u>Fermentation Solubles</u>	<input checked="" type="checkbox"/>	
	<input type="checkbox"/>	
	<input type="checkbox"/>	

* Please include the organism(s) last used for the manufacturing process for all components contained in the product.

- (a) that this (these) product(s) is/are neither a genetically modified organism (GMO) itself, nor does it/they contain any such organisms,
- (b) that this product neither consists of GMOs, nor is it manufactured from or with the help of GMOs. Neither do we have knowledge of any information that would implicate that this statement is incorrect.
- (c) For such risk components (enzymes, additives, microorganism...), where you can't rely on Council Regulation (EC) 1829/2003 (labeling of GMO), we are in possession of a written compliance agreement from the producers of each individual risk component contained in the above-mentioned product, guaranteeing both (a) and (b). These agreements are in our hands and are neither expired nor withdrawn.

Consequently, the product(s) named above fulfill(s) the requirements of the current version of the EU Council Regulation Nr. 834/2007 in terms of the prohibition of GMOs (see back: excerpt from the regulations contained in the current version of the EU Council Regulation No 834/07) as well as the interpretation thereof attached to this agreement.

A specification of the exact composition of the above-mentioned product(s) is enclosed with this agreement. With this agreement we are committed to make an immediate declaration of change, correction or withdrawal to our customers/buyers and to their inspection authority as soon as any deviation from the facts contained in this agreement or the agreements of our suppliers or service providers should occur.

According to article 2 of Council Regulation (EC) no. 834/2007 we authorize our customer's/buyer's inspection board or an independent institution named by the inspection authority to verify the validity of our statement and to take samples for analysis if necessary.

The signatory is liable for the accuracy of the statements made in this agreement.

Wuxue, China
Feb. 26th, 2010

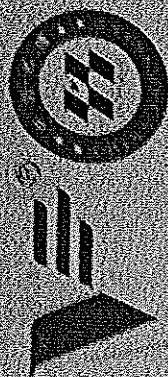
[Signature]



GMIO FREE

VITAMIN B₂ 80% SD FEED GRADE

维生素B₂ 80% 喷干微粒 (饲料级)



产品名称: 维生素B₂ 80% SD FEED GRADE
 规格: 25.0KG
 批号: 200908051
 生产日期: 2009.08.11
 有效期至: 2011.08.11
 保质期: 24个月
 贮存条件: 阴凉干燥处, 防潮, 避光
 运输条件: 普通货物运输
 包装: 25.0KG/袋
 净重: 25.0KG
 毛重: 26.5KG
 产地: 中国
 生产厂家: 山东恒通生物技术有限公司
 地址: 山东省潍坊市寿光市
 电话: 0536-2222222
 传真: 0536-2222222
 网址: www.hengtong.com.cn
 邮编: 261200

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 运输条件: 普通货物运输
 包装: 25.0KG/袋
 净重: 25.0KG
 毛重: 26.5KG
 产地: 中国
 生产厂家: 山东恒通生物技术有限公司
 地址: 山东省潍坊市寿光市
 电话: 0536-2222222
 传真: 0536-2222222
 网址: www.hengtong.com.cn
 邮编: 261200



山东恒通生物技术有限公司
 地址: 山东省潍坊市寿光市
 电话: 0536-2222222
 传真: 0536-2222222
 网址: www.hengtong.com.cn
 邮编: 261200

CERTIFICATE OF ANALYSIS

DATE: Aug 12, 2009

Name of Product: **VITAMIN B2 80% FEED GRADE (GMO FREE)**

Quantity: 1000KGS

Batch No.: 200908051

Batch Size: 1000KG

Packing Size: 25KGS

Manufacture Date: Aug 11, 2009

Expiry Date: Aug 10, 2012

Item of Test	Limits of Test	Results of Test
Colour	Yellow-orange to yellow-brown	Meets
Odour	Weak to none	Meets
Particle structure	Fine spray-dried granules	Meets
Identification	Positive	Meets
Particle size	60 U.S mesh	Meets
Heavy Metal	Max.25%	Meets
Residue on Ignition	Max 5%	4%
Humidity	Max 3.0%	1.2%
Content (Activity)	Min 80.0% (by HPLC Method)	80.6%

CONCLUSION: THIS BATCH HAS BEEN ANALYZED TO BE IN COMPLIANCE WITH OUR FACTORY INTERNAL CONTROLLING SPECIFICATIONS

QINGDAO FAR-REACHING
TRADING CO., LTD.

刘增好

MANAGER