



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

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Clarifications to the IFOAM EU position on organic wine making

Dear Jean Francois,

The IFOAM EU Group would like to comment the latest discussion with regard to establishing implementing rules for organic wine processing. Please also consider the detailed position paper of the IFOAM EU Group of 5th October and the letter sent on October 16. The comments below specify the IFOAM EU Group opinion on the issues we understood to be crucial points in the current discussion.

a) Heat treatment

IFOAM EU Group recommends permitting heat treatment as an essential technique in organic wine processing. These techniques are already allowed in organic processing of fruit juice and milk, without any problems.

Heat treatments are an important means of reducing or eliminating undesirable micro-organisms (i.e. bacteria), preventing fermentation and stabilizing the wine, particularly wines with sugar residues, thus reducing the need for additives (sulphites).

In the current discussion, it is proposed to allow “flash-pasteurization” with a temperature limitation of 65-70°C. It is anticipated that the temperature level will prove too difficult to control accurately, and therefore we recommend not applying any temperature limitation.

b) Reverse osmosis

In the opinion of the IFOAM EU Group reverse osmosis for must - but not for wine - can be accepted also after 2014.

c) Ion exchange resins

The IFOAM EU Group urges the EU to prohibit ion exchange resins for wines. The technique of ion exchange resins should ONLY be allowed for the production of Rectified Concentrated Musts (RCM). This measure is necessary to avoid unfair competition among producers. In Zone C (according to the CMO designation of wine zones), only RCM and CM (Concentrated Musts) are permitted for enrichment of wines, whereas in Zones A and B, sugars can be used for enrichment in

addition to RCM and CM. If ion exchange resins are disallowed for production of organic RCM, the result will be the prevention of enrichment in Zone C, which places Zone C producers at an unfair disadvantage relative to those in Zones A and B.

d) Ultra- and nano-filtration

The IFOAM EU Group rejects ultra- and nano-filtration, but accepts micro-filtration. This means in particular that only filters with a pore size ***larger than 0.2µm should be accepted*** and ultra- and nano-filtrations which require pore size ***smaller than 0.2µm will thereby be prohibited.***

e) Processing aids/additives

The IFOAM EU Group is in favour ***of maintaining separate lists for additives and processing aids. These two categories of substances have totally different functions in wine making:***

- Additives are added during the processing of wine, and remain in the final product (even if in very small quantities). Examples include sulphites, citric acid, and metatartaric acid.
- Processing aids are used to realize one step of the wine processing (such as filtration or clarification), but do not remain in the final product. Examples include gelatine, charcoals, and bentonite.

The separation of processing aid and additive lists would follow the logic of the CODEX Alimentarius.

It would even be preferable to have a third list for micro-organisms and enzymes, as previously proposed by the IFOAM EU Group.

f) Tannin/acids

The IFOAM EU Group believes it should always be the objective that additives allowed in organic processing are of organic origin.

However, in the case of tannins and acids (L-ascorbic acid, citric acid, L(+) tartaric acid, metatartaric acid) it is not actually feasible, as organic sources of these substances do not exist. Extending organic origins requirements to these substances would mean prohibiting them in organic wine processing. Nevertheless, as these additives are essential for organic wine processing, the IFOAM EU Group recommends allowing them, with the following conditions:

- Explicitly specify the origin of tannins

- Include in the organic wine making regulation a recommendation that additives of organic origin be used if available
- Undertake a review in five years.

g) Sulphites

The issue of sulphite reduction remains the most controversial for the organic sector. Some countries favour strong reduction of up to 50% whilst other countries are in favour of no reduction at all. However, on the following points the IFOAM EU Group agreed – as communicated already in our letter on October 16:

- A 50% reduction in SO₂ content is too high to allow organic wine production in all European wine regions. We are seriously concerned that this would force organic wine producers out of business. In the ORWINE report it is stated that in certain countries, up to 33% of samples tested could not conform to the 50%-reduction requirement. Given the limited number of samples and indications from expert advice, this number could be potentially higher.
- 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.
- Sulphite level prescriptions must take into account the different types of wines with different colours and residual sugar levels, as is the case under the CMO.
- Sulphite levels must be indicated in absolute values.
- According to the annex of the working document, special wines are excluded from the SO₂ 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.
- The double labelling (organic wines / wines from organic grapes) is rejected as already indicated in our position from October 5 and reflecting in the latest Commission working paper.

- Any reduction of sulphites should be coupled with an obligation of Member States to:
 1. Document and report on annual basis if a significant number of producers will face severe problems despite using best practice to achieve sulphite reduction (as for example outlined in the Code of Practice in ORWINE).
 2. Provide scientific evidence for re-examination of sulphite levels.
 3. Establish educational/training programmes to achieve the goal of sulphite reduction.

The targeted reduction and the further direction shall be re-examined in 2014 together with the other substances foreseen for evaluation.

Kind regards

A handwritten signature in black ink on a light-colored background. The signature is written in a cursive style and appears to read 'Marco Schlüter'.

Marco Schlüter
Director