



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

President: Francis Blake

Director: Marco Schlüter

European Office
Rue Commerce 124
1000 Brussels
Belgium

Phone: +32-2-280 12 23
Fax: : +32-2-735 7381
Email: info@ifoam-eu.org

Mr. Jean-Francois Hulot
Head of Unit, Organic Farming

DG AGRI F.5
Rue de la Loi 130
1049 Brussels
Belgium

Brussels, 12/01/2009

Registered in Sweden,
Uppsala under organisation
number 817606-9436

AQUACULTURE PROCESSING

Dear Jean-Francois,

SUBSTANCES: SULPHUR DIOXIDE

After having assessed the practices and existing substances used in European organic aquaculture processing we are of the conviction that:
- Several countries in the EU have private organic standards in place that do not allow the use of Sulphur dioxide (E 220) and Sodium meta bisulphite (E 222). Therefore we are of the opinion that these substances are not necessary for the production and therefore not meeting the criteria given in EEC 834/2007 article 21(1) (ii).

RECOMMENDATION

By consultation of our European members we have experienced that the following additives and processing aids should be authorised for the processing of aquaculture products. All the substances are listed in the current Annex VIII.

Substance	E -Number	Current status in organic regulation (Annex VIII)
Lactic acid	E 270	Listed in the regulation without limitations
Ascorbic acid	E 300	Listed in the regulation without limitations
Sodium lactate	E 325	Listed in the regulation limited to milk and meat products
Citric acid	E 330	Listed in the regulation limited to plant products
Sodium citrate	E 331	Listed in the regulation limited to animal products
Calcium citrate	E 333	Listed in the regulation limited to plant products
<i>Processing aids</i>		
Sodium hydroxide		Its limited to the production of rape seed oil and sugar

ACETIC ACIDS E260 AND SALTS (POTASSIUM ACETATE E261 AND SODIUM ACETATE E262)

Furthermore our members have informed us that the use of acetic acids and salts thereof are necessary for the production of aquaculture products. We see the chance to replace these substances by natural organic acetic acids but this technology has to be developed further. Therefore we are asking for a five year authorisation of these substances. These substances are not included in the current Annex VIII and therefore we provide a dossier for the evaluation process (see Annex I).

WATER, SALT, FLAVOURS, ENZYMES AND MICRO-ORGANISMS

For the processing of aquaculture products we ask to authorise the substances authorised in article 27 (1) (b) (c) (e) of EEC 889/2008.

LIQUID SMOKE FLAVOURS:

Additionally we recommend changing the wording in Article 27 (1) (c) to the following:

“c) Substances, and products as defined in Article 1 (2)(b)(i), 1 (2)(c) and 1 (2)(e) of Council Directive 88/388/EEC* labelled as natural flavouring substances, smoke flavourings or natural flavouring preparations, according to Articles 9(1)(d) and (2) of that Directive. For smoke flavourings only natural smoke applications and smoke condensate as defined in Council Regulation 2065/2003 article 3 1. and 4. without any further additives are accepted.”

**the references must be adapted to the coming flavour regulation*

Pure liquid smoke flavour has been used for the preparation of organic aquaculture products for many years under private standards.

We have discussed this application for a number of years, for other processed organic foods like tofu and meat products. We therefore propose a general authorisation of pure liquid smoke flavour.

The IFOAM EU Group has discussed this topic and has the opinion that natural liquid smoke flavour should be permitted for the processing of organic foods, mainly because of its benefits for health (§ 6 VO 2065/2003 in comparison to traditional smoke application. In comparison to the traditional smoking process natural fluid smoke aroma doesn't contain critical substances like "tar" nor "polycyclic aromatic hydrocarbons". Furthermore there is an environmental advantage: no smoke-emission.

The use of traditional smoking is established in the wording of article 26 (1) of 889/2008.

Additional to this we propose to include water based smoke condensates in EC Regulation 889/2008 for the processing of organic foods if they are produced without any further additives. The use of



liquid smoke flavourings should be limited to pure smoke condensate. This substance has been used for years in processing of organic animal based food on the basis of private organic standards before the 1st December 2007.

In order to establish a strict and consistent requirement for pure liquid smoke condensate we recommend taking the above proposed wording into consideration.

In order not to mislead consumer concerning the nature of the different products available, we also ask that the origin of the smoke should be indicated in the list of ingredients ("smoke" vs. "liquid smoke flavours").

We stand by with more information and input on the issue, should you require so.

With best wishes,

A handwritten signature in black ink, appearing to read "Francis Blake". The signature is fluid and cursive, with a horizontal line underlining the name.

Francis Blake

President, IFOAM EU Group

CC Richard Bates, DG Mare