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Position on organic wine making rules - sulphite reduction

Need for sub-categories in organic wine

The IFOAM EU Group appreciates the Commission’s proposal to restart the process of setting up rules for organic wine making and the attempt to come to a decision within this year, following the withdrawal of the former proposal, last summer. We are aware that the most controversial issue among member states remains level of Sulphur Dioxide (SO₂) reduction. The majority of our members believe that the issue of reduction of sulphite levels is an important criterion for organic wine making. Therefore in order to help the decision making process and to provide some guidance, the IFOAM EU Group started an intensive discussion process amongst experts in organic wine and our members.

1. Wine type – Categories as in Regulation (EC) No 606/2009	2. SO₂ Limits for conventional wine	3. Proposed SO₂ limits for organic wine
Red wines & liqueur wines / Annex I B -A(1) <i>residual sugar* < 5g/L</i>	150 mg/L	100-120 mg/L**
Red wines & liqueur wines / Annex I B -A(1) <i>residual sugar* =or > 5g/L</i>	200 mg/L	170 mg/L
White & rosé wines <i>residual sugar* < 5g/L</i>	200 mg/L	150-170 mg/L **
White & rosé wines <i>residual sugar* =or > 5g/L</i>	250 mg/L	220 mg/L
Special wines (List per countries***) in Annex I B - A.2 paragraph 2 c paragraph 2 d paragraph 2 e Annex I B -B paragraph 4 - weather conditions****	300 mg/L 350 mg/L 400 mg/L + 50 mg/L	270 mg/L 320 mg/L 370 mg/L (the same as CMO + 50 mg/L)
sparkling wines (Annex I C) quality sparkling wines other sparkling wines Annex I B - C paragraph 2 - weather conditions****	185 mg/L 235 mg/L +40 mg/L	155mg/L 205mg/L (the same as CMO + 40 mg/L)

* Residual sugar = sum of glucose & fructose
 ** See proposal below for further subcategories
 *** Provided by member states
 **** Referred to in art. 113(2) of EC No 479/2008

The overall goal of organic wine-making is to produce high quality wines while a) reducing the number of additives and processing aids to the really essential ones that fulfil the organic concept and b) to reduce the amount of those additives that must be used to the minimum strictly needed to ensure the quality of the wine. The maximum concentration of SO₂ for each wine category (as defined in Regulation (EC) No 606/2009) is shown in column 2 above. The IFOAM EU Group proposes a reduction in (SO₂) level for organic wine as shown in column 3 of this table.

To significantly reduce SO₂ use for the categories “*red wines with residual sugar < 5g/l*” and “*white and rosé wines with residual sugar < 5g/l*” leads to a different degree of applicability and difficulty depending on sugar content. Wines with residual sugar < 2g/l can cope with the limit proposed originally by the European Commission (50mg/l reduction). However, we suggest that this change should be combined with a fast-track flexibility clause e.g. for cases of exceptional climatic conditions in extreme years. In those cases, the reduction of SO₂ required would be 30 mg/l for the respective year.¹

Production of wines with residual sugar > 2g/l to <5g/l, is more difficult with the current state of knowledge. Similar difficulties are faced in wines that are meant for long storage (more than 2 years before trading).

Therefore we propose to establish, in addition to the categories defined in Regulation (EC) No 606/2009 only for organic wines and only for a limited period of time the following subcategories:

- *red wines with residual sugar >2 and < 5g/l*
- *white and rosé wines with residual sugar >2 and < 5g/l*
- *red wines with residual sugar < 5g/l and aged for at least 2 years before trading*
- *white and rosé wines with residual sugar < 5g/l and aged for at least 2 years before trading*

For these subcategories we propose reduction of SO₂ by 30mg/l

This subcategory differentiation is not pertinent for conventional wines as their higher limits in Regulation (EC) No 606/2009 permit safe production of all wine types included.

Further the view of the IFOAM EU group is that any further reductions in level of sulphites imposed by Regulation (EC) No 606/2009 should not automatically impose additional reduction for organic wines.

¹ 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.

Special wines and local specialties

Besides the difficulties in respecting SO₂ limits listed above some very “site specific” or “wine type specific” problems are possible and they depend on wine pH, tannin, sugar and alcohol content and a combination of other factors. For example; special dry red wines with low alcohol (<11%vol) and dry red wines made from disease tolerant varieties, have high pH values (pH>3.8). The very specific needs of these wines cannot be addressed in the regulation.

IFOAM EU group’s clear view is that these points should be handled at national level through the flexibility rules.

Step-wise approach

The regulatory process has to allow identification of the organic production method and it has to evolve together with the scientific and technical development. For the organic movement it is important to progress together in technique, quality and regulation. Therefore for organic wine we believe that it is advisable to review the whole list of additives and processing aids 4 years after entry into force of the new list and limits. In particular this should apply to the SO₂ limits for the specific provision of subcategories of wines for which we propose SO₂ reduction by 30 mg/l. However an additional year is needed to allow evaluation of long aging wines.

Therefore we propose that this specific provision should be withdrawn 4 years (long aging wines 5 years) after the entry into force and the SO₂ reduction should increase to 50 mg/l as for the other wine type of the same CMO category unless individual Member States perceive that there is a clear need to maintain specific provision for a longer period of time and supply to the Commission a specific request to maintain them (or some of them) supported by a scientifically based dossier (transparent documentation) demonstrating the need.

Even after the first period of implementation of the regulation it is clear attempt of the organic movement to progress together with the same regulatory basis for all MSs, so deciding, in case of request by any MS, within SCOF if to maintain the sub-category derogations or to evaluate the appropriateness of a zoning approach.