

## **IFOAM EU position paper**

Reaction to COM paper for SCOF meeting at October 19/20, 2009

Approved October 16, 2009

The IFOAM EU Group reacts with this paper on the Commission working paper for the SCOF meeting on October 19/20 2009 regards sulphites,

### **1. Sulphites**

The IFOAM EU Group discussed the issue of sulphite limitation intensively. However, at this stage the discussion is still ongoing and the IFOAM EU Group is not able to provide detailed recommendations and will do so at a later stage.

Nevertheless, the following points are agreed:

- The Commission working document for the discussion in the SCOF (October 19/20) proposes a general reduction of 75g/l sulphites. This would mean in the case of dry red wine a reduction of more than 50%! As indicated in our IFOAM EU position on 5 October 2009, a 50% SO<sub>2</sub> reduction is too high to allow organic wine production in all European wine regions. Therefore this proposal cannot be accepted by the IFOAM EU Group. We are seriously concerned that this would force organic wine producers out of business. In the ORWINE report it is stated that up to 33% of the samples in some countries could not conform to the 50% limitation. Given the limited number of samples and indications from expert advice, this number could be potentially higher.
- A fast track flexibility 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 frame 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.
- The sulphite levels have to take into account the different types of wines with different colours and the residual sugar levels, as is the case in the current European regulation on wine production (CMO).
- The sulphite levels must be indicated in absolute values.
- Regards Annex of working document the special wines have to be excluded from the SO<sub>2</sub> limitations and allowed to be labelled as “organic wines”: Special wines”, as defined in EU Reg. 606/2009 Annex IB (2c, d and e) as well as liqueur wines and sparkling wines, being so closely

linked to local tradition and in any case limited in scale of production and consumption, 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 on annual basis if a significant number of producers will face severe problems despite using best practise to achieve reduction of sulphites (as for example outlined in the Code of Practise 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.

### **2. Article 29c) Oenological practices**

Regards Article 29c) the IFOAM EU Group is concerned that important points have not been taken into account on Oenological practices. We urge the EU Commission and Member states that:

- Electrodialysis must be allowed for tartaric stabilisation, it can avoid (for big cellar) the use of thermal treatment (cold) which are very demanding in energy
- Reversal osmosis on must have to be allowed without restriction
- Ionic exchange resins according to point 20 of Annex IA of Regulation (EC) No 606/2009, must to be allowed without restriction ONLY for rectified concentrated musts
- Partial concentration through cooling must be prohibited
- Heat treatments according to point 2 of Annex IA of Regulation (EC) No 606/2009 may be used up to a maximum temperature of [70° C].
- Filtration (point d), there is a mistake: it should be “....pores shall be equal or above 0,2 micron”, that means to allow microfiltration but forbid nano and ultra filtration

### **3. ANNEX VIIIa - Processing aids**

The IFOAM EU Group is concerned that the working document doesn't suggest sufficiently the needs for organic wine processing and therefore it should be amended:

- The microcrystalline cellulose must be prohibited.
- After the 31 December 2015 the copper citrate must remain allowed.

Some processing aids are missing and should be added:

- Ammonium sulphate must to be maintained (with reservations and to phase out in the near future, to be evaluated until 2013);
- Yeasts cells ghosts should be added
- Diatomaceous earth should be added
- CO<sub>2</sub> should be added
- Yeasts mannoproteins should be added
- Oak chips must be allowed : in some regions of Europe the systematic use of oak barrel, to give woody taste to wine can represent a serious treat for the oaks forests, the use of oak chips can avoid this, and don't request the destruction of forests

#### **The permitted ingredients that must be of organic origin, have to be listed:**

- Sugar (beet or cane);
- Concentrated musts;
- Concentrated rectified musts;
- Caramel for some specific liquors;
- Alcohol for mutage (if possible in organic form);
- Alcohol (possibly in organic form) for liqueur wines.

#### **The permitted micro-organisms and enzymes have to be listed:**

- Enzymes (pectolytic, betaglucanase);
- Yeasts;
- Selected yeasts (if non-GM);
- Lactic bacteria (if non-GM);
- Fresh lies;