

Organic Wine Processing

Final Position, agreed on 25th September, 2009

The IFOAM EU Group position on organic wine implementing rules responds to the EC working document of the 25th June 2009 presented to the SCOF on the 30th of June 2009. The IFOAM EU position results from a long internal consultation process within the membership and intensive discussions among internal wine experts as well as the IFOAM EU Group board.

Nevertheless, on some points (sulphites and enrichment) IFOAM members need more time to find an acceptable solution for the whole organic movement, and therefore more detailed propositions will be sent very soon to the EU Commission.

1. GENERAL RECOMMENDATIONS

The IFOAM EU Group generally recommends the following issues to be considered when amending (EC) 889/2008 on organic wine processing:

- To ensure the identity of organic wine.
- To use organic ingredients.
- To use additives and processing aids from organic origins when available.
- To aim for a limited but appropriate list of substances used in organic wine processing (additives and processing aids, etc.) compared with CMO list.
- To avoid any products from GMO or GMO origins.

2. TECHNIQUES in Organic Wine Making

The IFOAM EU Group proposes to accept all the techniques currently allowed for wine making (approved in the CMO by date September 2009) but to exclude:

- Ultra- and nano-filtration;
- Ion exchange resins for wines;
- Vacuum evaporation of musts;
- Cryo-concentration of musts and wine;
- Wine separation techniques including spinning cone, reverse osmosis of wine, distillation.
- Physical elimination of sulphur dioxide (even if allowed by CMO at later stage)

When new techniques will become available within the CMO, they will have to be evaluated before being allowed for organic wine making.

The IFOAM EU Group asks for a general prohibition of ion exchange resins EXCEPT for must rectification. The IFOAM EU Group urges for permission of reverse osmosis of musts.

3. ENRICHMENT

The IFOAM EU Group agrees with the working paper of the EU Commission that “For enrichment only organic concentrated must, rectified concentrated must or sucrose may be used.” However, we suggest clearer language requiring the organic origin of all ingredients.

Regarding the issue of reduction of enrichment within IFOAM there are still different scenarios in discussion and; therefore the discussion needs more time. The IFOAM EU Group will come up with a proposal after an additional consultation round.

4. ADDITIVES

Regarding the “Use of certain products and substances in wine making” (art. 27a and Annex VIIIa), the IFOAM EU Group recommends:

- prohibition of lactic and malic acids and lysozyme;
- addition of CO₂;
- acceptance of L-ascorbic acid, citric acid, L(+)-tartaric acid, metatartaric acid;
- acceptance of arabic gum, aleppo pin resins, and tannins with the following specific recommendations that arabic gum be of organic origin, aleppo pin resins be allowed only for specific Greek wines (as defined in CMO), and the permitted origin of tannins be explicitly specified;
- acceptance of sulphur dioxide and potassium bisulfite or metabisulfite (see below);
- the listing of yeast cell wall (ghosts) as a processing aid.

5. PROCESSING AIDS

Regarding processing aids, the IFOAM EU Group proposes:

- **exclusion of:** kaolin, calcium alginates, microcrystalline cellulose, argon;
- **acceptance of all other substances** proposed by the EC with certain restrictions;
- **addition of:**
 - (Di-)ammonium phosphates;
 - ammonium sulphate (with reservations and to phase out in the near future, to be evaluated until 2013);
 - perlite;

- cellulose;
- diatomaceous earth;
- CO₂.

Further the IFOAM EU Group recommends:

- **creation of a list of permitted ingredients that must be of organic origin:**
 - sugar (beet or cane);
 - concentrated musts;
 - concentrated rectified musts;
 - caramel for some specific liqueurs;
 - alcohol for mutage (if possible in organic form);
 - alcohol (possibly in organic form) for liqueur wines.
- **creation of a list for permitted micro-organisms and enzymes:**
 - enzymes (pectolytic, betaglucanase);
 - yeasts;
 - selected yeasts (if non-GM);
 - lactic bacteria (if non-GM);
 - fresh lies;
- **further evaluation of some substances: ammonium sulphate, copper citrate and sulphate (to eventually phase out copper sulphate to be evaluated until 2013 and eventually to be replaced with copper citrate),**
- **prohibition of ureases pending further evaluation**

6. SULPHITES

The issue of sulphite reduction remains the most controversial for the organic sector and the discussion needs more time (some countries favours strong reduction of up to 50% whilst other countries are in favour of no reduction at all). The IFOAM EU Group will come up with a clear recommendation in the near future after additional internal consultation. However, we urge the EU Commission to recognise the sensitivity of the issue and to carefully consider the different options.

The IFOAM EU Group agrees to implementing rules on wine SO₂ levels which state that:

- The IFOAM EU Group doesn't express at this stage any recommendation for any SO₂ limitation or against it.
- However, the Commission proposal of 50% SO₂ reduction is too high and therefore not acceptable, because it does not allow organic wine production in all EU wine regions. Any solution must ensure that current operators will be enabled to continue their business.
- The double labelling (organic wines / wines from organic grapes) would confuse consumers and therefore should not be allowed.