



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

28 November 2006

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

Matti Hannula
Finnish Presidency
President of the Special Committee on Agriculture
Brussels
Belgium

Crucial issues regarding processed organic food

Dear Mr Hannula,

We appreciate very much that Annex VI has now been revised to include processed animal products. We would like to congratulate you for bringing this difficult and ambitious discussion to, eventually, a successful conclusion. Nevertheless a number of topics related to processing of organic foods have to be resolved to provide for a positive development for the sector and a level playing field within the EU. In this letter, we address some important topics related to the ongoing revision process of Regulation no. (EEC) 2092/91.

1. Percentage calculation of processed organic foods

There are problems with the percentage calculation of processed organic foods in general. For example Annex VI.A.2 allows the use of conventional (natural) aroma extracts in organic products. These substances are sometimes used in very high amounts for products called organic. Some organic products contain as much as 40% non-organic aroma extracts! A number of spice and herb mixtures, mostly used as a pre-product for the processing of organic foods, have high amounts of such non-organic aroma extracts. These are used to replace the natural organic ingredient, e.g. pepper, primarily to achieve a much lower price. Another important factor is that natural aroma extracts are not counted in the percentage calculation of agricultural origin. The result is that there is no limitation in the use of these conventional ingredients even if the raw material, such as soy or pepper, is obviously from agricultural origin.

Therefore we propose that all ingredients, including Annex VI.A but with the exception of water and salt, become part of the organic percentage calculation.

2. Certification of technical substances

The title of Annex VI.A defines the listed components as "*ingredients of non-agricultural origin*". This, together with uncertainties regarding the scope of the Regulation, causes problems for producers of organic technical components listed in Annex VI.A. As we understand, it was not the intention that the Regulation excludes so called "ingredients of non-agricultural origin" from being certified as organic if they are from agricultural origin.

There are already a number of technical ingredients available on the market which are from organic origin, for example organic lecithin, organic flavour extracts and organic yeast. We are sure you agree that it is a positive contribution to the authenticity of organic foods to make such components available in organic quality and to encourage their use, instead of conventional additives.

Therefore, the IFOAM EU Group proposes some changes in the structure of the Regulation to make it possible to certify as organic ingredients (additives) that are listed in Annex VI.A and processed in accordance with the Regulation.

We recognise that this topic is partly addressed in the current revision proposal, as presented by the Finnish Presidency draft of 25th October 2006. In particular, we see as very positive that yeast is mentioned under Article 2 as one substance that could be certified as organic. However, we think that this approach should be extended to all substances in Annex VI A that are, or are produced from, agricultural products.

3. Ion exchange technologies

The discussion about the acceptance of ion exchange technologies in organic food processing has been going on for several years. Some countries in the EU accept ion exchange technologies for organic products and others not. The use of ion exchange has a strong impact on product profiles, quality and prices. The different positions of member states on this topic therefore create concrete and unacceptable market conflicts.

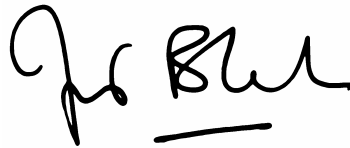
The IFOAM EU Group has expressed its concerns about this situation several times, but the Commission has brought forward no concrete proposal as yet. We would like to stress once again that this topic must

be reflected during the revision of the regulation and latest when Annex VI will be revised.

We propose to replace the phrase *“ingredients of non agricultural origin /.. and processing aids”* systematically in the whole new regulation by *“Additives, processing aids including ion exchange techniques, flavourings, preparations of micro-organisms, minerals, trace elements, vitamins, amino acids and other micronutrients and salt”*.

We hope that our contributions are helpful and ask you kindly to take these topics into consideration.

With kind regards
Yours sincerely

A handwritten signature in black ink, appearing to read 'Francis Blake', with a horizontal line underneath the name.

Francis Blake
President

Copy to: DG Agriculture, Standing Committee on Agriculture, Council Working Group on Organic farming, European Parliament Agriculture Committee