

Notice of a Revision of Chapter 6.6 and Appendix 4, Table 2 of the IFOAM Basic Standards, Version 2005

Bonn, 15th August 2007

After public consultation and based on the final recommendation by IFOAM's Standard Committee, the IFOAM World Board in August 2007 approved an urgent revision of Chapter 6.6 and Appendix 4 Table 2 of the 2005 Version of the IFOAM Basic Standards.

The revision became necessary because the original wording of Chapter 6.6 in relation to Appendix 4 Table 2 would create severe contradictions within the IBS.

Further information about the consultation process, the original proposal, and a more detailed rationale for the revision is provided below.

The following changes of Chapter 6.6 and Appendix 4, Table 2 of the 2005 version of the IFOAM Basic Standards will become effective as of the 31st of December 2007:

6.6 Cleaning, Disinfecting, and Sanitizing of ~~Food and~~ Food Processing Facilities

General Principle

Organic food is safe, of high quality, and free of substances used to clean, disinfect, and sanitize ~~food and~~ food processing facilities.

Recommendations

Handlers should clearly differentiate substances used to clean, disinfect and sanitize food handling equipment and food contact surfaces from those directly applied to food.

Operators should develop a management system for cleaning and disinfecting.

Operators should design facilities, plant layout, install equipment, and devise a cleaning, disinfecting and sanitizing system that prevents the contamination of food and food contact surfaces by prohibited substances, non-organic ingredients, pests, disease-causing organisms, and foreign material.

Handlers and processors should use physical and mechanical means such as dry heat, moist heat, exclusion, and other non-chemical methods, adequate water supplies and substances that appear on Appendix 4, [Table 2](#) to prevent microbiological contamination.

Allowed substances in Appendix 4, [Table 2](#) should be used with consideration to the environment.

The use of cleaning compounds should minimize the disposal of effluent and the use of disinfectants. Gray water recycling off-site, for uses other than handling or processing food, is preferred over either re-circulation or disposal.

Steam traps and filters should be used to remove non-volatile boiler water additives.

Operators should not use persistent cleansers and/or sanitizers that are not easily removed by an intervening event (e.g. quaternary ammonia) or have an adverse impact on the environment (e.g. halogenated compounds).

Standards shall require that:

6.6.1 Operators shall take all necessary precautions to protect organic food against contamination by substances prohibited in organic farming and handling, pests, disease-causing organisms, and foreign substances.

6.6.2 ~~Only water~~ Water and substances that appear in Appendix 4, Table 2, ~~as processing aids~~ may be used ~~after harvest~~ as equipment cleansers and equipment disinfectants that may come into direct contact with food. ~~cleaners or disinfectants in direct contact with organic food.~~

Substances other than those appearing on Appendix 4 are only allowed if they are legally required.

6.6.3 Operations that use cleaners, sanitizers, and disinfectants on food contact surfaces shall use them in a way that maintains the food’s organic integrity.

6.6.4 The operator shall perform an intervening event between the use of any cleaner, sanitizer, or disinfectant and the contact of organic food with that surface sufficient to prevent residual contamination of that organic food.

~~6.6.5 Substances included in Appendix 4 shall be evaluated by the criteria for processing and handling substances that appear in Appendix 1.~~

APPENDIX 4 – TABLE 2: INDICATIVE LIST OF EQUIPMENT CLEANSERS AND EQUIPMENT DISINFECTANTS THAT MAY COME INTO ~~INDIRECT CONTACT WITH FOOD~~

PRODUCT	LIMITATION/NOTE
Acetic acid	
Alcohol, ethyl (ethanol)	
Alcohol, isopropyl (isopropanol)	
Calcium hydroxide (slaked lime)	
Calcium hypochlorite	
Calcium oxide (quicklime)	
Chloride of lime (calcium oxychloride, calcium chloride, and calcium hydroxide)	
Chlorine dioxide	
Citric acid	
Formic acid	
Hydrogen peroxide	
Lactic acid	

Natural essences of plants	
Oxalic acid	
Ozone	
Peracetic acid	
Phosphoric acid	Only for dairy equipment
Plant extracts	
Potassium soap	
Sodium carbonate	
Sodium hydroxide (caustic soda)	
Sodium hypochlorite	E.g. as liquid bleach
Sodium soap	

Revision Process

In response to a proposal of the IFOAM Standards Committee the IFOAM World Board in April 2006 invited all IFOAM members to comment on a proposal for an urgent revision of Chapter 6.6 and Appendix 4 Table 2 of the IFOAM Basic Standards, version 2005. The proposal was to delete Appendix 4, Table 2 and to revise Chapter 6.6 to clarify that it only covers food processing facilities and not food. The invitation to comment, including the original rationale for the revision is available on the IFOAM website.

IFOAM received 14 comments on the proposed urgent revision. The majority of comments (10) supported the proposed revision of chapter 6.6 and the deletion of Appendix 4, Table 2. Four comments opposed the proposal while others proposed alternative solutions to solve the identified problems. All comments are also posted IFOAM website.

After thoroughly considering the comments and discussing the issue again the Standards Committee in June decided to recommend to the World Board an alternative revision. The WB adopted the proposed revisions as presented above.

Rationale

1. The intent of the previous SC was to regulate with Table 2 the surface treatment of processing equipment and not treatment of the food itself. This is neither consistently reflected in the requirements of chapter 6.6 (the chapter referring to Appendix 4 Table 2) nor in the title of Table 2. For example, IBS 6.6.2 refers to Appendix 4 Table 2 as a **conclusive** list of substances that may be used as post harvest treatment of **food**. At the same time, some of the substances on the list are not suitable for the treatment of food. On the other hand not all substances presently used in the processing industry for cleaning and sanitizing of equipment are listed, so that Table 2 can also not be a conclusive list of substances for this purpose.
2. The aforementioned problems fulfill the criteria for an urgent revision because they constitute a severe contradiction within the IBS and could thereby severely damage IFOAM's credibility as a standard setter. For further information please refer to IFOAM's Policy for Urgent Standards Revisions, which is also available on the IFOAM website.
3. Therefore, all references to food in Chapter 6.6 are removed and the name of Table 2 was changed to clarify that it is an **indicative** (rather than a conclusive) list for **equipment** cleansers and sanitizers.



INTERNATIONAL FEDERATION OF ORGANIC AGRICULTURE MOVEMENTS

As of the 20th of August 2007 these revisions will have been incorporated in all electronic versions and future hardcopies of the 2005 Versions of the IBS and the Norms. For all copies of the IBS and Norms (electronic and hardcopy) published before that date reference is made to this document and an Erratum which is published on the IFOAM website and placed in the print version of the Norms.