



International Federation of
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EU Regional Group

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Working for organic farming in Europe

Mr. Jean-Francois Hulot
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Brussels September 29, 2010

Registered in Sweden,
Uppsala under organisation
number 817606-9436

Re-examination of nitrite/nitrate, SO₂ and HCl

Dear Mr Hulot,

The 31st of December 2010 deadline for re-examination of **nitrite/nitrate, SO₂ and HCl** is coming closer. We ask you to inform us about the process and procedures for the re-examination of these three substances. We would also like to know whether, for the decision on use of these substances, advice will be asked from the new Expert group.

As we are aware that any re-examination you conduct will rely in part on the input you receive from the organic sector, we hereby provide you with an update of current position, activities and research results in Member States. We also offer some practical suggestions.

1. Nitrate/Nitrite

IFOAM EU Group confirms that, in principle, we agree with the provision of Article 27.3(a) of EC 889/2008 that both safe alternatives to added nitrite/nitrate are required and the appropriate educational programmes on alternative processing methods must be established.

We have engaged in an inclusive process of stakeholder consultation to establish the status of these investigations and programmes amongst European processors. Our consultation has revealed a highly complex and variable situation between Member States and production cultures.

We note, that at the present time it is not possible to accommodate the different stages of development, education and practice in this area throughout all Member States. Enough time is needed for a sound evaluation.

In order to reflect the wide range of positions and situations in the different member states we request that you undertake a careful and extensive re-examination. The processes and procedures of this re-examination should be transparent and the status of ongoing studies

and educational programs in different countries should be fully taken into account.

We would like to be fully informed of the process and procedure that you foresee for the re-examination of the use of nitrite and nitrate in the future.

2. SO₂

Another substance proposed for re-examination before 1st January 2011 is SO₂ for fruit wines. During the debate on the new wine regulation it was very clear that SO₂ is needed in the production of organic wine products (See ORWINE Project). There was a vigorous debate on the level of reduction of SO₂ that should be implemented for organic wine production.

When producing wine from fruits other than grapes we are facing the same technical problems. Even if there are some products which can be produced without the use of SO₂ the overwhelming majority of wine products from other fruits than grapes can only be produced with the use of SO₂. In the current requirements for organic fruit wine we have a reduction of SO₂ level to 50 mg or 100 mg in place now. This means we have a reduction of 50% to 75% SO₂ compared to the 200 mg allowed for conventional fruit wines, this is insufficient for continued production in some countries.

Because of the challenges we faced regarding SO₂ during the discussion of the implementation rules for wine, we kindly ask you to postpone the final decision on the permitted levels of addition of SO₂ for fruit wine until after the requirements for grape wine are finally decided.

Further, we ask you to make a small but necessary correction: In the last column of Annex VIII, relevant for fruit wine, the wording is currently as follows:

"For cider and perry prepared with the addition of sugar..."

This wording should be changed to:

*"For cider and perry **and fruit** wine prepared with the addition of sugar..."*

Most other fruit wine must be produced with added sugar or juice concentrate because the berries typically have low sugar content. These products have the same technological characteristics as cider and perry produced with the addition of sugar. Even Annex III part B of Directive 95/2/EC authorises SO₂ for fruit wine product group characterised as proposed above.

3. HCl

The use of HCl should be re-examined before 1st January 2011. We request that we are informed about the planned process and procedures of the re-evaluation of HCl used as processing aid in the salt-bath for cheese production in the specific situation of the Netherlands.

We can inform you that in the Netherlands a range of practical studies have started to investigate whether HCl can be replaced by milk-acid in the traditionally processed Dutch cheeses, without affecting the typical taste and structure. As some of the hard-rind Gouda cheeses reach their optimal taste only after one year, more time is needed for further research and evaluation prior to implementation.

If you need further information please feel free to contact us.

With best regards,

A handwritten signature in dark ink on a light-colored background. The signature is cursive and appears to read 'Marco Schlüter'.

Marco Schlüter, Director

CC: SCOF