

International Federation
of Organic Agriculture Movements
EU Regional Group

Brussels, 15th May 2013

Mr João Onofre,
Head of unit, H3
DG Agriculture and Rural Development
European Commission
Brussels

Dear Mr Onofre,

IFOAM EU Group would like to present its position on Annex IX of Regulation (EC) No 889/2008. Annex IX is the list of non-organic agricultural ingredients that may be used in organic processing and refers to products that, at the time of the first establishment of the list in 2000, were not available in sufficient quantity and/or quality in the organic sector. Afterwards the organic sector has significantly developed and today many of the ingredients on Annex IX are sufficiently available.

The proposal is to delete such products from the list for two main reasons. The first one is the consumer perception, consumers are always skeptic about conventional ingredients allowed in organic processing. The second is that deleting products will be an important driver for organic sector to increase the efforts to provide such ingredients in organic quality. In fact the list was supposed to be temporary to make the sector able to provide such ingredients. On the contrary the list has been almost stuck for 13 years.

In some countries there can be still problem of shortage for some of the products that should be deleted. In this cases, derogations on member states level could be still used.

Commission and Member States have been discussed the topic during the last meetings of the Standing Committee on Organic Farming.

IFOAM EU Group, through its Specialist Group on Organic Processing, reviewed the list and collected input from the organic food sector across Europe and the outcomes are reported in the annex A of this letter. Many of the ingredients currently present in the list have been found to be available in organic quality and the list could be cut by half.

With thanks and best wishes,



Marco Schlüter
IFOAM EU Group Director

Annex A

A) To delete from Annex IX of Reg. (EC) No. 889/2008:

- Acorns - *Quercus spp.*
- Gooseberries - *Ribes uva-crispa*
- Maracujas (passion fruit) - *Passiflora edulis*
- Raspberries (dried) - *Rubus idaeus*
- Red currants (dried) - *Ribes rubrum*
- Pepper (Peruvian) - *Schinus molle L.*
- Lesser galanga - *Alpinia officinarum*
- Fructose
- Unleavened bread paper
- Pea protein - *Pisum spp.*
- Kirsch prepared on the basis of fruits and flavourings as referred to in Art.27(1)(c)
- Whey powder "*herasuola*"

B) To stay in Annex IX of Reg. (EC) No. 889/2008 due to shortage in quantity and/or quality :

- Cola nuts - *Cola acuminata*
- Horseradish seeds - *Armoracia rusticana*
- Safflower flowers - *Carthamus tinctorius*
- Watercress herb - *Nasturtium officinal*
- Algae, including seaweed, permitted in non-organic foodstuffs preparation
- Rice paper
- Starch from rice and waxy maize, not chemically modified (**2 different kind of starch should be in 2 different lines**)
- Rum, only obtained from cane sugar juice
- Aquatic organisms, not originating from aquaculture, and permitted in no-organic foodstuffs preparation
- Gelatin (**gelatin from other source than pork should stay**)
- Casings

C) Point 2.1 of Annex IX of Reg. (EC) No. 889/2008 to be revised

In the current version "*Fats and oils whether or not refined, but not chemically modified, derived from plants other than cocoa, coconut, olive, sunflower, palm, rape, safflower, sesame, soya*" are allowed in organic processing.

IFOAM EU Group thinks that there should be a change in the systematic. This list should be made into a positive list of oils and fats which are not available in organic quality, like the rest of Annex IX.

For example, corn oil is not currently available. On the contrary oils and fats derived by hazelnut, argan, peanut, almond, pumpkin (seed), walnut, flax, camelina, onager oil, grape (seed) are available and shouldn't be allowed.