



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

Brussels, 20/05/2011

President: Christopher Stopes

Director: Marco Schlüter

European Office

Rue du Commerce 124
1000 Brussels
Belgium

Phone: +32-2-280 1223

Fax: +32-2-735 7381

Email: info@ifoam-eu.org

Head of Organic Farming Unit
Directorate-General for Agriculture and Rural Development
European Commission
BE- 1049 Brussels

Dear Mr Jean-François Hulot,

We would like to draw your attention to the fact that with the exception of one small adaptation the technical details for processing of organic foods has not been revised for several years.

Please find attached a number of letters that IFOAM EU group has sent to your department over the last few years. We note that most of the content has not been included so far in legislative proposals. We note that since the letters a number of these topics have become urgent. For example the topic of liquid smoke flavour has resulted in a notification from The Netherlands.

Further the whole regulatory framework on legislation related to food additives has changed significantly over the last years. These changes make urgent the need for a fundamental revision on the provisions for organic food processing.

We would therefore like to stress that commission should start the process of revision of the technical requirements for processing of organic food.

In particular we request that the Expert Group (EGTOP) should start work on the area of additives and processing aids for organic processing as soon as possible.

There is one issue that is especially urgent, relating to the recent amendment to the Organic Regulations in Regulation (EU) No 344/2011 and in particular to the addition of Rosemary extract, with the specific condition: "Only when derived from organic production and if only ethanol is used for the extraction". We request that the words "and if only ethanol is used for the extraction." should be removed. The majority of the extraction currently carried out on Organic Rosemary for the purpose of creating an effective antioxidant is done using liquid Carbon dioxide, which is permitted for organic production in both annexes VIII A and VIII B of regulation (EC) No 889/2008.

We hope you can proceed as we wish and we look forward to hearing about your timescales for this process. Feel free to contact us for further information.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'Marco Schlüter', on a light-colored background.

Marco Schlüter
IFOAM EU Group Director

Annexes:

1. IFOAM EU Group letter on organic processing - annexes VIII and IX of November 18, 2010
2. IFOAM EU Group letter on rosemary extract, ion exchange and glycerol (organic certification of additives, restricted use of organic additives) of July 22, 2010
3. IFOAM EU Group Letter on the crucial topics - processed organic food of September 14, 2009
4. IFOAM EU Group letter on certification of organic additives of May 8, 2009