



*Working for organic farming in Europe*

International Federation of  
Organic Agriculture Movements –  
EU Regional Group

Brussels, 22/07/2010

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Mr. Jean-François Hulot  
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**Rosemary extract, ion exchange and glycerol (organic certification of additive, restricted use of organic additives)**

Registered in Sweden,  
Uppsala under organisation  
number 817606-9436

Dear Jean-Francois Hulot,

The IFOAM EU Group has been informed that a number of questions regarding additives were addressed in SCOF. Therefore, we take the liberty of presenting our opinion on the topics in order to facilitate a well-balanced decision.

**1. Organic rosemary extract**

Organic rosemary extract has been broadly used in organic processing as "food" for many years, and has been labelled as a normal ingredient from agricultural origin. However, from a technological point of view, rosemary extract has antioxidant properties that allow treating it as an additive. Last year, DG Sanco finalised the decision to list rosemary extract as an additive because of its technological role as antioxidant. Organic rosemary extract, therefore, acquired the status of an additive (E 392). However, because this additive is not listed in annex VIII of Regulation (EC) No. 889/2008, it can no longer be used in organic processing.

Therefore, the IFOAM EU Group proposes to add rosemary extract (E 392) to annex VIII of Reg. 889/2008 for use in animal and plant products, even if there is a consensus to keep this list as short as possible. Moreover, for this additive, for the first time in the history of EU organic regulations, a clarification "only in organic quality" should be added under "specific conditions".

## **2. Ion Exchange**

The problem with ion exchange in the EU today is related to different approaches towards these food processing techniques among Member States. This leads to a situation where these techniques are accepted for organic processing in some countries, and in others not. This causes quite a bit of problems and market distortion.

The IFOAM EU Group has already expressed its position on this issue in previous communications (e.g. letter of September 14, 2009): The IFOAM EU Group asked for allowing only specific and restricted applications of ion exchange techniques in organic processing. On the basis of the legal mechanism established in article 19 (3) of Regulation (EC) No 834/2007, the legal situation should be clarified before it is useful to debate the single application of these techniques.

## **3. Glycerol (organic certification of additives, restricted use of organic additives)**

To clarify France's question is very important.

The organic certification of food additives according to the organic regulation was debated and clarified in the case of flavourings. The differentiation, which is presented in article 27 (2) of Reg. 889/2008, is only relevant for the calculation of the percentage in accordance with article 23 (4) of Reg. 834/2007. This differentiation has no effect on the scope or other requirements of organic regulations. If an additive from agricultural origin is used as "food" (according to article 1 (2) b) of Reg. 834/2007), it can be certified as organic. This answers the question posed by the French SCOF member in May 2010; glycerol as food ingredient can be certified as organic food ingredient (additive).

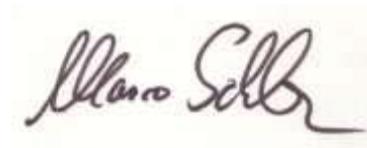
The conditions given in Annex VIII of Reg. 889/2008 also apply to additives certified as organic. In article 6 b) of Reg. 834/2007, it is stated that specific substances with technological and sensorial properties can only be used if authorised. In article 19 (2), it is clearly outlined for which categories of substances (additives, processing aids,

flavours...) this restriction is relevant. Substances falling under the legal definition of these terms can only be used if evaluated in accordance with article 21 (Reg. 834/2007), and listed in article 27 and annex VIII of Reg. 889/2008.

Article 27 (1) of Reg. 889/2008 once again includes provisions that substances falling under the definition of the terms defined in article 19 b) of Reg. 834/2007 can only be used when listed in Annex VIII.

These limitations fully apply whether the substances are certified as organic or not. An additive certified as organic and not listed in Annex VIII cannot be used in the processing of organic foods. The IFOAM EU Group asks the Commission to again clarify this view with Member States to prevent further discussion on similar subjects.

Thank you for taking our comments into consideration.

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

Marco Schlüter, Director IFOAM EU Group

Copy to: SCOF, organic unit