



International Federation of
Organic Agriculture Movements –
EU Regional Group

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Working for organic farming in Europe

Dacian Ciolos
European Commissioner for Agriculture and Rural Development
European Commission
BE-1049 Brussels

Copies sent to: Georg Häusler, Alina Stefania Ujupan; Jean Luc Demarty, Loretta Dormal Marino, Maria Angeles Benitez Salas ; Jean François Hulot, Maria Fladl and to the members of the standing committee on organic farming

RE: SO₂ levels in organic wine regulation

Brussels, 10 June 2010

Registered in Sweden, Uppsala
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Dear Commissioner,

The implementing rules for EU organic wine have been in discussion for about one year and are the final part of the new organic regulation. Already much has been achieved with the current COM proposal as a result of the discussion between the sector, the standing committee on organic farming (SCOF) and the EU Commission. The current COM proposal will enable differentiation between organic and conventional wines and thus will allow the organic sector to communicate the added value of organic wine to consumers. The IFOAM EU Group believes that the most important characteristic of organic wine remains the use of organically produced grapes. Other key features of organic wine include the prohibition of a range of processing aids and production techniques for organic wine making and the requirement to use ingredients of organic origin wherever possible.

However, the issue of sulphite reduction remains controversial among member states and made an agreement so far impossible. The IFOAM EU Group fully acknowledges the difficulty of finding a majority for any proposal due to the different SO₂ reduction levels discussed within the SCOF, e.g. the current COM proposal of a 50mg/l reduction (for dry wines) appears to have a majority against it. Recently, the French ministry proposed a reduction of 30mg/l for any wine types and as far as we understand there is a high chance that this proposal could attract majority support.

Therefore the IFOAM EU Group urges the Commission to:

- a) Adopt the French suggestion of a reduction of 30mg/l in its legal proposal seeking a positive vote in the SCOF;
- b) Commit to a monitoring of SO₂ level of all different wine types and a re-assessment after 4 years to evaluate whether SO₂ levels can be further reduced, for some or all wine types, to reach a total reduction level of 50mg/l, without endangering producers' livelihoods.

The IFOAM EU Group highlights the importance of achieving agreement within the SCOF, for the following reasons:

- The issue of SO₂ reduction has been discussed for a long time. If

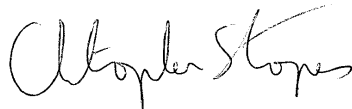
there is the possibility of a majority position amongst the different member states, this opportunity should be taken.

- The use of the labelling rules and the organic logo becomes mandatory from 1 July onwards. If the dossier on this issue were to be forward to the Council, wine made from organically produced grapes could not be sold as organic. This would result in the wine having to be sold as conventional with a substantial market and economic penalty.
- The organic regulation and implementing rules will ensure that, as regards organic wine production and processing (additives, techniques, ingredients), there would be a real added value for the consumers. Therefore the sector would welcome to agreement on the implementing rules on organic wine as soon as possible.
- Private initiatives to communicate greater reductions in SO₂ levels, where relevant for local/national markets should be welcomed.

Further we want to highlight again that double labeling ('organic wines' and 'wines from organic grapes'), currently in discussion, is rejected by the sector as it would lead only to the confusion of the consumer.

In trust that you will take our arguments into account, please do not hesitate to contact me if you would like to discuss this further.

With best wishes,

A handwritten signature in black ink that reads "Christopher Stopes". The signature is written in a cursive, flowing style.

Christopher Stopes
President